

IN THE CRIMINAL APPEALS COURT FOR THE STATE OF TENNESSEE  
MIDDLE DIVISION SECTION AT NASHVILLE

**Willie Austin Davis**

Defendant/Appellant

vs.

Case No. M2019-01852-CCA-R3-CD  
Trial No. 2017-A-62

**State of Tennessee**

Plaintiff/Appellee



---

**BRIEF OF APPELLANT WILLIE AUSTIN DAVIS**

---

**Oral Argument Requested**

Willie Austin Davis - Citizen  
221 31<sup>st</sup> Ave. North Apt# 135  
Nashville, TN 37203  
615-999-8190 [fmdshiloh@aol.com](mailto:fmdshiloh@aol.com)

## Table of Contents

Table of Authorities	ii
Statement of Issues Presented	1
Introduction	2-9
Statement of the Case	10-12
Statement of Facts	13-43
Argument	44-46
Conclusion	47
Certificate of Service	48
Post-Judgment Exhibit 1	49
Post Judgment Exhibit 2	50

## Table of Authorities

1. Tennessee Constitution Article 1 Section 3	9, 31, 32
2. United States Constitution – 1 <sup>st</sup> Amendment	9
3. Tennessee Constitution Article VI Section 11	44
4. <i>State v Austin</i> , 87 S.W.3d 447, 470 (Tenn.2002).	44
5. <i>Bd. Of Prof'l Responsibility v. Slavin</i> , 145 S.W.3d538, 548 (Tenn.2004).	44
6. <i>Bean v. Bailey</i> , 280 S.W.3d 798, 803 (Tenn. 2009).	44
7. Tenn. Sup. Ct. R.,10, 10B.	44
8. Tenn. R. App. 36(b)	44
9. <i>Bell v. Todd</i> 206 S.W.3d 86, 90-91 (Tenn. Ct. App 2005).	45
10. <i>Davis v. Liberty Mut. Ins. Co.</i> , 38 S.W.3d 560, 564 (Tenn 2001).	45
11. " <i>Bd. of Prof'l. Responsibility v. Parrish</i> , 556 S.W.3d 153, 166 (Tenn. 2008)	45

## Statement of Issues Presented

1. Whether Appellant received a fair, impartial trial before Judge Steve Dozier in submission to the supreme authority of the Tennessee Constitution and the Tennessee Supreme Court's Judicial Conduct Rule 10B?

In an abundance of caution, protected information is **REDACTED** in submission to Attorney Larry Crain's permanent injunction granted on 9/24/2018. Attorney Larry Crain represents child-molester John Perry, and **REDACTED**, a victim of child-molester John Perry who sued Austin Davis for \$3 million for "*defamation and invasion of privacy.*"

Attorney Larry Crain, child-molester John Perry, and **REDACTED**, a victim of child-molester John Perry, contend that adult child sex abuse of a minor child across state lines in violation of the Federal Mann Act is a "*private*" matter, and the Tennessee Supreme Court has agreed by granting a \$2.1 million default judgment in favor of **REDACTED** against Austin Davis.

Child-molester John Perry's "*safe house*" is still well protected by Nashville Police, and child-molester John Perry has redefined "*heinous*" child sex abuse across state lines as a "*private difficulty*" in his global statement to the London Daily Mail on June 11, 2015. Per the Federal Mann Act, there is NO statute of limitations for child sex abuse across state lines. However, child-molester John Perry and his "*safe house*" are more protected than Jeffrey Epstein, Ghislaine Maxwell, and Prince Andrew of the British Royal Family.

<https://www.dailymail.co.uk/news/article-3120240/New-child-abuse-scandal-hits-Mike-Huckabee-Republican-White-House-hopeful-s-author-molested-girl-11-escaped-charges-statute-limitations.html>

<https://www.wadeburleson.org/2015/06/child-abuse-statute-of-limitations-and.html>

## Introduction

Appellant is unable to overcome the powerful influence of Attorney Worrick Robinson, and his long-time friendships and associations with imprisoned ex-Judge Casey Moreland, Judge Steve Dozier, and Judge Cheryl Blackburn, without the power and help of Almighty God.

Appellant is compelled by the State of Tennessee to write the Appellant brief with an unhealed broken wrist using jury selection and trial transcripts that are unsigned and uncertified by Judge Steve Dozier's Court reporter, Shana Crawford.

As a result of Shana Crawford's failure or unwillingness to sign and certify the jury selection and trial transcripts as "*true, accurate and complete,*" Appellant is uncertain who physically transcribed and produced the jury selection and trial transcripts being relied upon by the Appellant for writing the Appellant's brief.

Appellant has repeatedly expressed concerns about the accuracy of court transcripts since April 2019 and has repeatedly requested access to the original audio-video recordings of his court hearings to ensure transcript integrity and accuracy, but all requests have been denied.

Appellant attempted to have a personal recording of his own criminal hearings as a Defendant with poor hearing, but Judge Dozier was prejudiced against the Appellant to rule in favor of the more powerful State of Tennessee to prohibit the Appellant from recording his own judicial proceedings as a defendant. TE Vol 8 – Pg 2. TR Vol 1 – Pgs 30-36

The Court: And Mr. Davis, if you will step up, we will resolve that. Mr. Davis, the state has filed a motion about a recording device. Do you have one today?

Mr. Davis: Yes, sir.

The Court: Is it on or off?

Mr. Davis: It is on.

The Court: Okay. Well turn it off. Pull it out and just turn it off. We can't have a hearing about a recording device when you are recording.

Mr. Davis: Okay.

The Court: All right. You can have a seat over there."

Appellant also recorded court hearings because a child sex abuse Mann Act Federal crime cover-up has been on-going in Tennessee Courts since 2013 and Appellant contends he is protected by law to record any criminal activity for future use in the prosecution of a Mann Act Federal crime cover-up, even criminal activity occurring in a courtroom. Post-Judgment Attached Exhibit 1 – The Honorable Thomas Brothers Letter To DA Glenn Funk.

Appellant includes the post-judgment sworn testimony of child sex abuse therapist, Caroline Cone, since a Mann Act Federal crime cover-up is now in process before the Tennessee Court of Criminal Appeals. Post-Judgment Attached Exhibit 2 – Caroline Cone Deposition – Case # M2018-02011-COA-R3-CV – Full Copy included with Appellant’s Recusal Motion

Q. In the lawsuits, they’ve given the ages 11 and then they changed it; they went to 12. Do you know what the age was?

A. I believe the age when REDACTED was first sexually abused – is that what you’re asking me?

Q. Uh-huh.

A. Was 11.

Q. Eleven? The lawsuit says -- uses the word “incident,” which seems to indicate it’s only one time. Is it one time or is it multiple times?

A. Multiple times.

Q. Is it constrained just to Tennessee?

A. No.

Q. What other states?

A. I’m not sure what other states there are, but I think some of the incidents occurred outside of Tennessee.

Q. Did REDACTED go over that or give you any information on those states, where it was?

A. Yes, sir.

Appellant provided irrefutable truthful information about a child sex abuse cover-up to Judge Steve Dozier, Asst. DA Chandler Harris, and Asst. DA Jenny Charles, only to be mocked, ridiculed, wrongfully convicted and ultimately punished with jailed for 18 days on a totally false charge of aggravated criminal trespass founded upon the deliberate perjury of DA Star Prosecution Witness Scott Troxel.

Presiding Trial Judge Steve Dozier, a friend of Attorney Worrick Robinson who is a campaign sponsor for Judge Steve Dozier, was blinded by favoritism and prejudice against the Appellant who was unlawfully banned from his Uncle Don Dozier's church, Covenant Presbyterian Church, where powerful Attorney Worrick was also a member. Judge Dozier was so blinded by his bias he did not care about a Covenant child sex abuse cover-up case as evidenced in this pre-trial hearing on Sept 6, 2017. TE Vol 9 – Pg 11.

The Court: But all I'm saying the 160 something witnesses-- we are not going to try-- I don't know who-- I don't even know who you claim abused somebody and **don't care**. But we are not going to be trying whether or not someone was sexually abused at Covenant Presbyterian Church."

Mr. Davis: **"You don't care about that?"**

Judge Steve Dozier also did not really care about whether a pro se defendant could subpoena witnesses to provide an adequate defense to the contaminated indictment charge during the same Sept 6, 2017 pre-trial hearing. TE Vol 9 – Pg 21.

The Court: Anything else, Mr. Davis.

Mr. Davis: I've come to the courthouse and asked if I was issue subpoenas and I was told that I can't because I am pro se—

The Court: Okay. That's inaccurate.

Mr. Davis: Huh?

The Court: You would be allowed to issue subpoenas as long as it's not the President and the Governor and things we have already talked about."

Mr. Davis: I was just asking because I was told that I couldn't. So...

The Court: Okay... So if it's some witness that you think need to her here for a relevant defense, then—

Judge Dozier wasn't really concerned at all with the Appellant's inability to subpoena witnesses and he did not answer the Appellant's question on how to overcome the courthouse roadblock to obtain a subpoena for a witness to testify, or to another follow-up question about where to come for jury selection.

Judge Steve Dozier was prejudiced and close-minded against the Appellant for 14 months since the very 1<sup>st</sup> arraignment hearing on Aug 24, 2016. TE Vol 6 – Pg 3



Mr. Davis: "I've lost my home, lost everything over this child-molestation case that has been covered up.

The Court: Okay. I don't know anything about that.

Mr. Davis: That's what I am here to tell you.

The Court: This is a criminal trespass case.

Mr. Davis: It's tied to-- it's part of the cover-up.

The Court: Excuse me? Do What?

Mr. Davis: It's part of the cover-up. The trespass is part of the cover-up.

The Court: Okay. Where do you live.

Judge Steve Dozier was prejudiced in favor of Covenant Presbyterian Church where Attorney Worrick Robinson and his Uncle Don Dozier were members, and he used the entrusted power of his elected public judicial office to shut down questions about John Perry and his "*safe house*" to protect all of the members and leaders at Covenant involved in a Mann Act Federal cover-up crime. TE Vol 10 Pg 31-32

The Court: To put the child sex abuse investigation that you think did not properly occur with the Covenant Presbyterian Church some of it's participants/members behind you. You no longer have to do that and that's going to be a blessing to you. You are going to be so relieved that you no longer have to be with your husband knight in shining armor to protect REDACTED or any -one else that may have had anything done to them by people from Covenant Presbyterian Church, that is going together to be such a blessing to you; would you agree.

Judge Steve Dozier was prejudiced in favor of Attorney Worrick Robinson, and he protected Covenant security guard and Davidson County Sheriff Sgt. Solomon Holley (secret grand juror), and Worrick Robinson's long-time friend and legal client, ex-Judge Casey Moreland, who is now serving time in Federal Prison for: obstruction of justice, conspiring to retaliate against witnesses, theft from a federal program, destroying documents/evidence, and tampering with witnesses. TE Vol 10 Pg 9-10. TE Vol 10 Pg 41

Mr. Davis: Well, I mean, I am being accused of being a creep pee stalker is what was told to a jury. I have a lot of issues with the trial. I have a lot of issues that Judge Casey Moreland, close friend of Worrick, is the one that bound me over for indictment. So I have a lot of issues.



The Court: You went through the grand jury, the Casey Moreland thing, it's history. It has nothing to do with the grand jury that looked at your charge and decided to indict you. So all of that is history. It doesn't have anything to do with Casey Moreland.

Judge Steve Dozier was prejudiced against the Appellant to double-down extra hard to silence the Appellant to protect child-molester John Perry during an on-going Mann Act Federal crime cover-up. TE Vol 10 – Pg 46. TE Vol 10 – Pg 21. TE Vol 10 – Pgs 44-45

The Court: You, from my humble perspective, need to let all of us, on your behalf, to put this case at end, put this case behind you. Your pursuit of these suspected child abusers, put it behind you.

The Court: This is going to end today... So he's not going to be involved in all of this John Perry, et all, so it's going to end today.

The Court: "All the sins that you've done, that he's done, that I've done, they are all the same."

Judge Dozier extended this prejudice with a threat to a banned, bullied, and molested girl victim (Appellant's daughter), who had been targeted and repeatedly bullied by Judge Steve Dozier's friend and campaign donor, Attorney Worrick Robinson, even though Appellant's daughter was not present in the courtroom for the 1<sup>st</sup> arraignment hearing, or even a defendant in the prejudiced "*malicious prosecution*" of the Appellant. TE Vol 6 – 7-8. TR Vol 1 – Pg 46 -

263

The Court: Can you tell her not to be texting or emailing the assistant DA.

Mr. Davis: Well, I mean is that something I'm supposed to do. It's a free country.

The Court: I'm just asking you. Otherwise, she may charge your daughter with harassment or something. Just convey that to your daughter, can you do that?

Mr. Davis: Okay. I will say that there is a child-molestation cover-up and people have been speaking out about what's going on.

The Court: Okay. If you don't care about your daughter, then she may charge her.

Mr. Davis: I do care about my daughter.

The Court: All right. Then just relay that hey a court downtown asked you to quit text or emailing the DA, that's all I am asking. Can you do that?

Mr. Davis: Yeah. I can do that. I feel like that violates her First Amendment rights,

but I will do that.”

The Court: Okay. Well then sue me. Get her to sue me. All right. You can step back.

Judge Steve Dozier, Asst. DA Chandler Harris, and Asst. DA Jenny Charles were so blinded by their common goal of convicting the Appellant that all of them ignored the courageous sworn testimony of a banned, bullied and molested girl victim (Appellant’s daughter) to the shame and disgrace of their name and reputations as public servants. Exhibit 5 - Motion For New Trial Hearing 3 of 4 – Transcript of Trial Vol 2 – Pgs 65 – 93.

Judge Dozier also ignored the Appellant’s request for both DA’s to take the stand under sworn oath to testify during a “*malicious prosecution*” of the Appellant and a real-time Mann Act Federal crime cover-up taking place before Judge Steve Dozier in a Tennessee court of law, and now on-going before the Tennessee Court of Criminal Appeals. Exhibit 5 - Motion For New Trial Hearing 3 of 4 – Transcript of Trial Vol 2 – Pg 92.

The Court: Further proof, Mr. Davis. Any other witnesses you have?

Mr. Davis: I would like to call the DA’s to the stand if I can?

The Court: Based on what?

Mr. Davis: They brought up stuff about letters, I have got questions I would like to ask them.

The Court: Okay. All right. Any other witnesses other than the two DA’s?

Mr. Davis: No.

The Court: All right. Ladies and Gentleman, if you will step down the hallway just a --

Judge Dozier’s 14-month record of tailored prejudiced rulings, prohibitions on the Appellant’s right to record his own court hearings and trial as a defendant, the suppression of the Oct, 25, 2015 audio recording from the jury during the criminal trial, and the continued judicial abuse extended to the Appellant’s banned, bullied, and molested daughter-- via the court ordered destruction of an audio recording made of the “*jury selection*”-- expose the true facts of how Judge Steve Dozier was stealth and shrewd to control and manage a judicial process towards a

conviction to protect a Mann Act Federal crime cover-up connected to the Ukraine, Presidential Politics, Gov. Mike Huckabee, Rev. Franklin Graham, and the global legacy of Rev. Billy Graham.. Exhibit 5 - Motion For New Trial Hearing 2 of 4 – Transcript of Trial Vol 1 - Pgs 17-

18. Post Judgment Attached Exhibit 2 – Caroline Cone Deposition

The Court: All right. Mr. Davis, one question, and I will preface by saying you are doing great, doing a great job for what it's worth. It may not mean anything to you. But we had this discussion, I don't know when, several months ago about the official court reporter and the recordings that are made, everything is recorded. Nobody is going to mistreat you in here in any way from my perspective. But why do we have your daughter recording everything?

Mr. Davis: I don't have my daughter recording everything. I don't have –

The Court: Okay. So you didn't know she was.

Mr. Davis: No.

The Court: Okay. Bring Daisy Davis back in.

Court Officer: And I requested that she do that out there, so it may already be off, but she was very concerned about –

The Court: Okay. Just let her step back in. I don't want to keep her phone.

Mr. Davis: I'm not recording. I'm just –

The Court: Yeah, that's fine. You know not to, so -- okay. Ms Davis, and I have discussed this with your father, Mr. Davis here, he is aware that-- we have recordings of this-- nobody is going to do anything that's not being recorded, but we can't have parties and witnesses recording things. So I'm not chastising you or anything, I just want to make sure that you take your phone with this young lady's assistance and just delete anything that has been recorded. Is that a problem?

The Witness: (Shades head negatively.)

The Court: All right. We will be in recess then in 1:20.

Appellant prays Attorney General Herbert Slatery will find the moral courage to set aside his personal friendships with the five justices of The Tennessee Supreme Court, former Gov. Bill Haslam, Gov. Bill Lee, Covenant Pastor Billy Barnes, Former Speaker Beth Harwell (a Covenant Member at the time of the Appellant's false retaliation arrest), possibly Worrick Robinson and Federal Judge Chip Campbell, plus many other members of Covenant Presbyterian Church, Christ Presbyterian Church, the Nashville Presbytery, and the Presbyterian Church in America, to fully investigate Attorney Worrick Robinson, ex-Judge Casey Moreland, Judge

Steve Dozier, Judge Cheryl Blackburn, child-molester John Perry, Mrs. Susan Ann (Perry) Clark, Attorney Larry Crain, and a Tennessee child sex abuse cover-up crime which took place at Covenant Presbyterian Church during the Presidential Election of 2008, and is still continuing during the Presidential Election of 2020.

Appellant prays the Honorable Court will “*seek the truth*” to fully exercise “*sua sponte*” authority to overcome Judge Steve Dozier’s prejudice and favoritism in pursuit of “*substantial justice*” to rightfully remedy and correct an unfair, prejudiced pre-indictment process before Judge Casey Moreland; to remedy and correct two contaminated grand jury indictments before Judge Steve Dozier and Judge Cheryl Blackburn; to remedy and correct an unfair, prejudiced trial by Judge Steve Dozier, who did not recuse until after the Appellant’s sentencing; and to remedy and correct an unfair, prejudiced denied New Trial motion by Judge Cheryl Blackburn, who presided over the Appellant’s 2<sup>nd</sup> contaminated grand jury indictment, which included Davidson County Sheriff Sergeant Solomon Holley, who initially arrested the Appellant at a public Sunday church service on Nov. 15, 2015-- recorded on video-- in violation of the governing by-laws of the Presbyterian Church in America, Article I Section III of the Tennessee Constitution, and the First Amendment freedom of the United States Constitution. TR Vol 4 – 407-435. 5 Exhibits – Motion For New Trial Hearing - Exhibits 1-4

The Honorable Andy D. Bennett wrote the following minority opinion in a related child sex abuse cover-up lawsuit involving the Appellant: “I believe Mr. Davis did not receive an impartial trial... I firmly believe that the tainted orders created by the undeniable violation of Rule 10B injure the judicial process if left uncorrected.” See TN Case # REDACTED

God Bless, The Honorable Andy D. Bennett.

### Statement of the Case

On Nov. 15, 2015, Appellant was falsely arrested during a public Sunday worship service based upon a fraudulent, unauthorized trespass letter written by Covenant Elder Scott Troxel with the legal counsel of Attorney Worrick Robinson. Appellant was initially stopped and arrested at Covenant Presbyterian Church by Appellant's future secret grand juror, Davidson County Sheriff Sgt. Solomon Holley, prior to MNPD Officer John Daughtery handcuffing the Appellant in front of the Appellant's banned, bullied and molested daughter. TR Vol 4 – 407-435. 5 Exhibits – Motion For New Trial Hearing - Exhibits 1-4

Appellant's banned, bullied and molested daughter, who was bullied out of The Harpeth Hall School, was also was a 2<sup>nd</sup> police suspect per the Nov 15, 2015 CAD report, because she told the Davidson County Sheriff Sgt. Solomon Holley about a child sex abuse cover-up still ongoing at Covenant Presbyterian Church. Appellant's daughter asked Sgt. Solomon Holley during the video arrest a question about his legal authority, who took draconian action crushing and trampling Article 1 Section 3 of the Tennessee Constitution. 5 Exhibits – Motion For New Trial Hearing - Exhibits 4 (videos). TR Vol 1 – Pg 18.

Appellant's Daughter: So you have the legal right to arrest him?  
Davidson County Sheriff Sgt. Solomon Holley: Yes.

On April 20, 2016, Attorney Worrick Robinson's long-time friend and legal client, ex-Judge Casey Moreland did not recuse from the Appellant's case and bound the Appellant over to Judge Steve Dozier's grand jury for a contaminated indictment. On Aug 1, 2016, Judge Steve Dozier's secret contaminated grand jury indicted the Appellant for aggravated criminal trespass at a church property with Harpeth Hall Alumnae Relations Director Scottie Coombs serving on the contaminated grand jury. Judge Steve Dozier was assigned the Appellant's case and Judge Steve Dozier presided over the pre-trial schedule on Aug 22, 2016. The Appellant refused to

make a deal with DA Glenn Funk's Office so DA Glenn Funk obtained a superseded indictment on Jan 24, 2017 to include a private school property with Judge Cheryl Blackburn presiding over the 2<sup>nd</sup> secret contaminated grand jury. Judge Steve Dozier presided over the Appellant's arraignment, pre-trial hearings, jury selection, trial and sentencing, without ever disclosing his friendship with Covenant Member Worrick Robinson, or the fact that his father, Tom Dozier, was the longest serving police officer in the history of Nashville, or that his uncle, Don Dozier, was a former police officer and a Covenant Member at the time of the Appellant's false arrest, until Judge Steve Dozier finally recused from the Appellant's case about a month after the sentencing hearing on Oct 23, 2017 while the Appellant was locked away in jail.

On Oct 23, 2017, the Appellant accepted the delivery of the recusal order from one of Judge Dozier's female court officers three days after the Appellant was imprisoned following the deliberate perjury of Covenant Elder Scott Troxel and an arrest warrant ultimately signed by Judge Cheryl Blackburn in Judge Steve Dozier's absence. Judge Cheryl Blackburn was assigned the Appellant's case and then she ignored the Appellant's recusal request and continued to preside over the New Trial / Mistrial Motion for approximately 21 months until she finally denied the Appellant's New Trial motion on Sept 17, 2019. (*Appellant's Mistrial-New Trial Motion hand-written in jail said: "Judge Blackburn should resign if she is assigned this case."*)

TR Vol 3 - Pg 322

Judge Cheryl Blackburn presided over the hand-picked secret grand jury which returned a superseded indictment against the Appellant, and Judge Blackburn's contaminated grand jury included Davidson County Sheriff Sergeant and Covenant Security Guard Solomon Holley, who was paid to participate in the false arrest of the Appellant. (*Note: The grand juror's oath*

*prohibits anyone from sitting on a grand jury “for any reward” or “hatred, malice and ill will” toward a citizen.)*

On Oct 16, 2019, Appellant filed a notice of appeal with the Tennessee Criminal Court of Appeals. Appellant has recently been provided information that Lead Prosecutor and Asst. DA Chandler Harris has relocated to the Philadelphia, PA area to work for Mullen Coughlin Law Firm and is no longer in the State of Tennessee where his “*malicious prosecution*” took place, assisted by Asst. DA Jenny Charles.



### Statement of the Facts

During the jury selection phase of the Appellant's trial, Appellant told the jury: "I'm just trying to figure out if there is anybody in here that might be prejudiced against me in any way that might hurt me." Exhibit 5 – Motion For New Trial – 1 of 4 – Transcript of Jury Selection - Pg 92

Appellant was desperately searching to uncover if anybody in the courtroom had a friendship or blood-kin relationship to Worrick Robinson, Casey Moreland, or the Nashville Police Department.

With Judge Dozier listening from the bench, Appellant asked potential juror Ms. Elisa Thiele a question. Exhibit 5 – Motion For New Trial – 1 of 4 – Transcript of Jury Selection - Pg 111.

Q. Do you have any police members in your family or are you kin or anything to anyone or to Worrick Robinson or Judge Casey Moreland?

Judge Steve Dozier repeatedly informed the jurors how important it was for them to be **fair and impartial**, and to tell the truth with their answers, but he himself chose not to disclose his own personal friendship with Attorney Worrick Robinson, or his blood-kin relationship former Metro Nashville Police Officers: Major Tom Dozier (father), and Don Dozier (Uncle). Exhibit 5 – Motion For New Trial – 1 of 4 – Transcript of Jury Selection - Pgs 16, 17, 20, 21, 29

Judge Steve Dozier was not too concerned about current or former Fraternal Order Of Police General Counsel Worrick Robinson, the police, or the integrity of the jury selection process as evidenced by a comment during the supposedly "*random*" jury selection process. (Appellant's wife said she was in a jury pool months early with one of the potential jurors seated at the beginning of the "*random*" jury selection process). Exhibit 5 – Motion For New Trial – 1 of 4 – Transcript of Jury Selection - Pg 29

The Court. Okay. And that's fine. We've had police on juries. We have had lawyers on juries. So there is nothing disqualifying obviously about knowing one of the parties.

Article VI Section 11 of The Tennessee Constitution requires judges to disclose conflicts of interest prior to a trial to obtain the needed "consent" of all parties for a judge to remain on a case. Attorney Worrick Robinson's friend, Judge Steve Dozier, presided over the 1<sup>st</sup> secret grand jury that indicted the Appellant, with Harpeth Hall Alumnae Director Scottie Coombs serving on the contaminated grand jury term while Ms. ~~Coombs~~<sup>Coombs</sup> sent a disparaging letter to thousands of Harpeth Hall alumnae about a banned, bullied, molested and humiliated former Harpeth Hall girl student (Appellant's daughter). TR Vol 3 – 332

Judge Steve Dozier presided over both of Appellant's arraignments and pre-trial hearings; presided over the jury selection, trial and sentencing, and never disclosed his friendship with Covenant Member Worrick Robinson, or the fact that his father, Tom Dozier, was the longest serving police officer in the history of Nashville, or that his uncle, Don Dozier, was a former police officer and a Covenant Member at the time of the Appellant's false arrest.

In an tacit admission of guilt, Judge Steve Dozier recused about a month after the Appellant's sentencing hearing on Oct 23, 2017, after the Appellant had been jailed for three days for providing truthful information to the MBA-Harpeth Hall-Brentwood Academy communities about Attorney Larry Crain (*John and REDACTED's attorney*), a child sex abuse cover-up at Covenant Presbyterian Church, and the private school connection of Covenant Deacon Ken Cheeseman to paragraph 15 of the Brentwood Academy alleged gang rape lawsuit, along with information that Judge Steve Dozier's uncle, Don Dozier, made derogatory "*Martin Lucifer*" comments on his Facebook page about Dr. Martin Luther King, Jr.. TR Vol 3 – Pg 334. TR Vol 3 – Pg 316-317. TR Vol 3 – Pg 349.

Judge Cheryl Blackburn didn't seem very concerned about the Appellant's ability to obtain a **fair, impartial** trial because she denied the Appellant's New Trial Motion even though she hand-picked a secret grand juror who was paid to arrest the Appellant. She also denied the Appellant's sworn declaration as a New Trial Motion exhibit, and she apparently did not provide the Honorable Appellate Court with the Appellant's sworn declaration or a copy of Judge Steve Dozier's post-trial recusal order. Appellant made sure both were included in the appellate record for the Honorable Court to review. (*Note: Ken Cheeseman is the new Head of School for The Webb School*). TR Vol 4 – Pgs 429 – 435.

Appellant provided sworn testimony before Judge Cheryl Blackburn about Davidson County Sheriff Sgt. Solomon Holley who served on Appellant's contaminated grand jury. TE Vol 14 – Pgs 28-29

Q. When were you arrested?

A. November 15, 2015.

Q. When was your first indictment brought down? Approximately is fine.

A. On or about August 1, 2016.

Q. When was your 2<sup>nd</sup> indictment brought down?

A. On or about January 24, 2017.

Q. When was your trial?

A. September 11<sup>th</sup> and 12<sup>th</sup>, 2017.

Q. And after your trial and conviction. Did you begin investigating what had happened with your Grand Jury?

A. Yes.

Q. At some point did you discover that Solomon Holley was a signature of the final report of the Grand Jury, during the time period that your indictment was brought down?

A. Yes.

Q. And at some point did you make the connection that Solomon Holley was, also, the security guard that detained you at Covenant Presbyterian Church on the day of your arrest?

A. Yes.

Q. Approximately when did you make that connection?

A. On or about April the 30<sup>th</sup>, 2019.

Q. About how long after trial was that?

A. Well, it would have been, at least a year and a half, I think, is the math on that.

Judge Cheryl Blackburn was prejudiced against the Appellant and did her best to prohibit the Appellant from freely speaking out about a child sex abuse cover-up and the Brentwood Academy alleged gang rape lawsuit during his sworn testimony against MBA Headmaster Brad Gioia. TE Vol 13 – Pgs 21-22

Q. Mr. Davis, you expressed your desire to testify. Is there anything you would like to add to this hearing?

A. Yeah. I was trying to communicate to people about a child sex abuse cover-up and its connection to the rape of a, an alleged rape of a 6<sup>th</sup> grade student.

Q. Okay. But.

A. I'm not trying to scare anybody. I have not threatened anybody in the emails or anything. I mean people can turn me into a monster and a threat, but I basically have been looking after the protection of kids.

The Court: Okay, Mr. Davis, that is an issue I think that has gotten you into a lot of trouble.

A. It shouldn't.

The Court: Well. But you keep emailing and, correct me if I'm wrong, emailing and sending out all these mass emails about that, and people don't want to hear about it.

A. Well the DA's Office should be prosecuting child-molesters instead of covering them up.

Judge Cheryl Blackburn threatened to put Appellant in jail if he continued speaking out about the child sex abuse cover-up and the connections to former Covenant Deacon Ken Cheeseman and paragraph 15 of the Brentwood Academy alleged gang rape lawsuit involving a 6<sup>th</sup> grade student who lived about 12 houses away from protected child-molester John Perry in Belle Meade. TE Vol 13 – Pg 23

A. She's asking me why, because I don't want to be shackled on that issue.

The Court: Okay. Well. You're going to be shackled on that issue, one way or another, and that would be by me telling you something or I am going to put you in jail again.

Appellant includes this excerpt above because ex-Judge Casey Moreland, Judge Steve Dozier, and Judge Cheryl Blackburn were clearly prejudiced against the Appellant protecting sex crimes against children, and also protecting Attorney Worrick Robinson, and child-molester John Perry.

The Tennessee Code of Judicial Conduct states in Rule 2.15 A:

“A judge having knowledge that another judge has committed a violation of this Code that raises a substantial question regarding the judge’s honesty, trustworthiness, or fitness as a judge in other respects shall inform the appropriate authority.”

Judge Steve Dozier didn’t take action on Appellant’s complaints regarding Attorney Worrick Robinson, ex-Judge Casey Moreland, and his lack of trust in the fairness of the “*indictment-grand jury*” process and the courts, and Judge Steve Dozier did not answer a direct question about judicial recusal. TR Vol 7 – Pg. 3

Mr. Davis: No sir, it’s a real important question, do I get to defend myself in the Court? Judge Casey Moreland is the one that bound me over this grand jury that indicted me about four days before Ms. Terry-- or 14 days before Ms. Terry was found across the street in the Stahlman building. He should have recused himself before he indicted me. Do you think judges should recuse themselves from certain cases? (*Note: Ms. Leigh Terry was Harpeth Hall Alumna.*)

During the same March 10, 2017 hearing, Judge Steve Dozier had this exchange with the Appellant. TE Vol 7 – Pg 10

The Court: If that is true, then why wouldn’t you want the Court to appoint you counsel?

Mr. Davis: Because I don’t trust the Courts. I’ve been bound over to a grand jury and indicted by a judge that should have recused himself in a case because Worrick Robinson was at the heart of the reason I was arrested. And he’s representing Judge Moreland in an FBI investigation in front of a board of review. And I don’t think that judges ought to be putting people in front of grand juries and indicting them.

The Court: Okay. Well, what does that have to do with the grand jury indicting you? Do you think there were somehow in collusion?

Mr. Davis: Because I don’t think that judges providing over my case. He should have recused himself from my case. He gives favors to some people behind the benches back in the back and other people he comes in and bonds them over to the grand jury.”

On April 20, 2017, Appellant had this pre-trial exchange with Judge Steve Dozier about Former Birmingham Police Chief, Bull Connor, and Worrick Robinson. TE Vol 8 – Pg 7-8.

Mr. Davis: I want to think about it. I'm getting discovery from places outside of Nashville provided to me again yesterday. And I would say before the DA's Office wants to come put me in jail because I was handcuffed and arrested at Covenant Presbyterian Church out in Green Hills for reporting a child-molester tied to Mike Huckabee who ran for present. That, they might want to go examine before they become the Bull Connor of Nashville. Because you're tied to Bull Connor down in Birmingham, Alabama, and the child-- and the things that went on down there and you better go look at the history of who you are protecting. Because you are protecting the Presbyterian Churches of America. And they are the ones that arrested me and prosecuted me through you. So if the State wants to do that, wants to become Bull Connor and Worrick Robinson, and that's what Nashville wants to have. Worrick is one of the reasons I'm here.

Judge Dozier took specific action against the Appellant by banning him from saying Bull Connor during the trial, and the Appellant later learned post-sentencing about Uncle Don Dozier's derogatory use of "*Martin Lucifer*" to describe Dr. Martin Luther King, Jr.. In addition, Judge Dozier took tailored additional punishment to ban the Appellant from both church locations where his Uncle Don Dozier had been or was a member: Covenant Presbyterian Church, and Westminster Chapel, aka Stephens Valley Church, which met at Julia Green Public School with the protection of Nashville Police. TR Vol 3 -- 349. TR Vol 2 -- Pg 271. TR Vol 3 -- Pg 312.

The Appellant was ultimately banned from Covenant Presbyterian Church, Julia Green Public School, the 1<sup>st</sup> Vanderbilt Rape Trial and subsequent Vanderbilt Rape trials, the public courthouse, the Brentwood office location for Westminster Chapel, Stephens Valley Church, the MBA Community (which includes the Harpeth Hall community), and many other places and public events, with all "*no contact -- property bannings*" founded upon the fraudulent, unauthorized 2008 trespass letter written by Covenant Elder Scott Troxel with legal counsel provided by Attorney Worrick Robinson.

Below is an exchange between Judge Steve Dozier and the Appellant about Scott Troxel's unauthorized 2008 "*trespass*" letter. Exhibit 5 – Motion For New Trial – 3 of 4 – Transcript of Trial – Vol 1 – Pgs 184-185

The Court: No, you are not on trial for 2008. They are just saying they put you on notice of that with the letter."

Mr. Davis: Yeah, and it's a foundation for trespass. That is the letter that everything is built on. The house is standing on that letter.

Judge Steve Dozier, Asst DA Chandler Harris, and Asst. DA Jenny Charles were not very concerned about the authority, authenticity and legality of a 2008 trespass letter, since no one even presented or reviewed the property deed in court involving a fraudulent, unauthorized trespass letter written by Scott Troxel with the legal advice of powerful Attorney Worrick Robinson.

Former Asst. DA Chandler Harris chose to stand on Scott Troxel's fraudulent trespass foundation which appears to be his motive for fleeing to Philadelphia, PA as the Appellant proceeded forward with his criminal appeal here in Tennessee.

Former Asst. DA Chandler Harris' star prosecution witness, Covenant Elder Scott Troxel, was brazen to committ criminal perjury to convict the Appellant with his untrue testimony that the Covenant Presbyterian Church Session had authorized him to write a trespass letter on June 27, 2008. Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 - Pg 36

Q. And that caused you to write the letter to me?

A. **Yeah, the Session basically approved for me to write the letter.**

Q. They did.

A. Uh-huh.

Scott Troxel personally testified on the witness stand that the Covenant Session made the ban decision, approved the trespass letter, and that he personally wrote the fraudulent,



unauthorized trespass letter on June 27, 2008. Exhibit 5 – Motion For New Trial – 2 of 4 –

Transcript of Trial – Vol 1 - Pg 29

Q. Based off this letter, did the Session make a decision as to whether or not Mr. Davis was allowed on the property?

A. Yes.

Q. Okay. And what decision was made?

A. That he would not be allowed. We were –

Q. Okay. And did you personally draft the correspondence to that letter?

A. Yes, uh-huh.

Scott Troxel testified that Judge Steve Dozier's campaign donor and friend, Covenant Member Worrick Robinson, advised him on writing the fraudulent, unauthorized trespass letter to the Appellant. Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 - Pg 37.

A. This was the measured response that was recommended by an attorney. And we had sent the letter to you letting you know about the trespass and --.

Q. Who was the attorney?

A. There was Worrick Robinson was one of the attorneys consulted.

Attorney Worrick Robinson advised Scott Troxel on the June 27, 2008 trespass letter, and he also made a false report to Nashville Police to protect child-molester John Perry and a Mann Act Federal crime cover-up at Covenant Presbyterian Church. Post-Judgment Exhibit 2 - Caroline Cone Deposition.

Asst. DA Chandler Harris was provided Metro Nashville Police Report # 2008-4444221 in discovery which clearly reveals that Covenant Member Worrick Robinson made a false report to Nashville Police on July 2, 2008, stating he had witnessed the Appellant trespass at Covenant Presbyterian Church on Sunday, June 29, 2008, when it was impossible for the Appellant to commit trespass since Scott Troxel's letter was fraudulent, unauthorized, and possessed no legal authority. TR Vol 1 – Pg 111-112

Sgt. Twana Chick wrote her report on July 2, 2008, after a 2-hour night-time visit to the Appellant's private home in Forrest Hills:

*"I spoke with Worrick Robinson who witnessed the trespass. He said the subject was not belligerent, but was confrontational. He only felt concerned when he learned the subject asked the security officer if he had a gun. He gave me the names of the security officers- Juan Knight and Troy Stackhouse."*

Asst. DA Chandler Harris was provided Appellant's discovery which included Sgt. Twana Chick's 2008 police report, plus the exculpatory 2008 Covenant Presbyterian Church Board Minutes which prove the Covenant Session did not meet or authorize Scott Troxel's June 27, 2008 trespass letter during the month of June because the Covenant Session **did not** meet in June 2008.

Below is information about May, June, and July Covenant Board Minutes. TR Vol 1 – Pgs 80-85.

May 19, 2008 – Covenant Board Minutes: "Next Session meeting July 21, 2008. TR Vol 1 – Pg 81.

June, 2008 – The Session **did not** meet in the month of June when Scott Troxel wrote his unauthorized letter on June 27, 2008, with the advice of Attorney Worrick Robinson.

July 14, 2008 – The Session discussed the Appellant as a security "threat" while child-molester John Perry was protected. TR Vol 1 – Pgs 84-85.

The Covenant Board Meeting on July 14, 2008, reveals the Covenant "child sex abuse – safe house" cover-up was in a full court press with Nashville Metro Police present in the Board Room and Clerk of Session Scott Troxel signing the Covenant Board Minutes. Below are a few excerpts from the July 14, 2008 Covenant Board Minutes. TR Vol 1 – Pgs 84-85

"Combined meeting with the Deacons was conducted. Officer Chick, Joe Eades, Jim Bachmann, and Worrick Robinson provided background concerning Austin Davis. Mr. Robinson advised that the Session's response to the perceived security

concerns did not have to be the strongest legal response Available, but a reasonable response is necessary. After full discussion, Deacons left the room for the Session to continue the Stated meeting.... **M/S/P Accept John Perry's resignation from the Diaconate...** Signed by Scott Troxel, Clerk of the Session.”

Nine years later during the Appellant's aggravated criminal trespass trial, Scott Troxel repeatedly testified he and the Covenant Session were not hiding anything. Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 - Pg 48

The Witness: We were hiding nothing.

By Mr. Davis:

Q. You what?

A. We were hiding nothing.

However, Scott Troxel melted under pressure in front of the jury to finally admit that he and the Covenant Session knew about Covenant Deacon John Perry's child sex abuse prior to the July 14, 2008 Covenant Session Meeting in which child-molester John Perry was given a “*free pass*” and allowed to quietly resign from the Diaconate while the Appellant was falsely reported to Nashville Police as a possible mentally ill church shooter “*threat.*” Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 – Pgs 49-51

By Mr. Davis: I want to know if you know about John Perry, the co-author of Mike Huckabee that is a child-molester that the church put children in his home and he went off to Arizona and got treatment in April 2008?

The Court: Okay. Hang on. Do you know anything about John Perry?

The Witness: I know what he's talking about.

The Court: Okay. Well, answer that first and then we can go forward.

The Witness: So was it: Do I know, is that what you—

By Mr. Davis: Well, y'all –

A. I'm sorry, I –

Q. I'm asking about six years of my concern about children.

A. I'm just trying to remember if you are asking, did I know him?

Q. You said there is nothing that you were hiding. So I am asking you: do you know about that?

**A. Yes, I do.**

The Court: And the question is, just so I'm clear: Who is John Perry?

Mr. Davis: He's a coauthor with--

The Court: No, I'm not -- I'm trying to help you break it down into.

Mr. Davis: Okay. I'm sorry.

The Court: Break it down into snippets of questions.

The Witness: Sure. John Perry was a former member, he was a deacon, and **he revealed to the Session that he –**

The Court: He what? I didn't understand what you said, revealed?

The Witness: Well, no, no, no. Actually I don't think he revealed. **I'm trying to recall how we found out, but basically we learned that he molested REDACTED.**

Judge Dozier did a great job of managing and leading Scott Troxel through his challenging sworn testimony but the "*child sex abuse – safe house cover-up*" door had been knocked opened and Scott Troxel could not hide any more as he answered more questions in greater detail about child-molester John Perry and the July 14, 2008 Covenant Board Meeting. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 53 - 55. TR Vol 1 – Pgs 84-85

By Mr. Davis:

Q. Did you and the Session and your lawyer, Worrick Robinson pick up the phone and call the Nashville Police and report a known child molester back in 2008 before police were used on me?

A. Basically, I don't recall exactly what we did or learned at the time. I know that everything we did was vetted by an attorney. I don't remember if it was Worrick Robinson or who at the time. But the statute of limitations or – had run out is my understanding from what I recall on the offense and REDACTED chose not to press charges. And so there was no burden on the Church's part, from what I recall, to contact the authorities on that. And he was immediately removed as a deacon.

Q. Do you know when that was?

A. I don't recall, no.

Q. You ever seen any board minutes? We've got something here that I –

A. Yeah.

Mr. Davis: Am I able to present the board minutes from that meeting?

The Court: You wanting to show him something?

Mr. Davis: Yeah.

The Court: Okay. What is that? And does the State-- show that to the -- see if that have that or want to see it. (Document passed.) All right. What is your question?

By Mr. Davis: Can you tell me when that Board Meeting was?

A. This says July 14<sup>th</sup>, 2008.

Q. And who was in that board meeting as guest at the church property?

A. It says, Worrick Robinson, provided background concerning Austin Davis.

Q. Who else was there? It's got guest over there on the –

A. Oh, yeah.

Q. Worrick was one of the guests and then who was the other?

A. And then Officer Tony Chec (phonetic) with Metro Nashville Police.

Q. So a police officer came to a church board meeting?

A. Yes.

Q. And then it's got my name down there where I am being discussed; is that right?

A. Yes, uh-huh.

Q. Do you want to read that so everybody can hear what they are discussing about?

A. Let's see, it says: Worrick Robinson provided background concerning Austin Davis. Mr. Robinson advised that the Session's response to the perceived security concerns did not have to be the strongest legal response available, but a reasonable response is necessary. After a full discussion, deacons left the room for a session to continue this dated meeting. And so this was on July 14<sup>th</sup>. I believe the letter you sent was on the 25<sup>th</sup> of June.

Scott Troxel continued to testify about protected child-molester John Perry, Worrick Robinson, and the Nashville Police. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 53 - 55. TR Vol 1 – Pgs 55-56

A. Yeah, uh-huh. This is in our regularly scheduled session meeting.

Q. And do you see anything on there about John Perry.

A. One of the items is to accept John Perry's resignation from the Diaconate.

The Court: From the what?

The Witness: Diaconate, that's the group of deacons. That's the plural of the group of deacons.

By Mr. Davis: Does it say anything in those minutes about telling Officer Chec or Worrick Robinson who I think is the, the Union Police guy or whatever, represents the police when they go before the board. Does it say anything there at all about them reporting a known child molester to the police or is all the attention in the board meeting focused on me?

Scott Troxel testified in more detail about John Perry, "*heinous*" sins, and how John Perry remained a member in good standing at Covenant until June 6, 2010, after more than 2 years since Covenant Pastor Larry Ferris contacted child sex abuse therapist Caroline Post Cone in April 2008 – See Recusal Motion Exhibit 1. Exhibit 5 – Motion For New Trial – 2 of 4 – Trial Transcript Vol 1 – Pgs 61-62

By Mr. Davis:

Q. I want to know if that helps him remember how long it was before John Perry was excommunicated from Covenant?

A. This is-- the congregational meeting was held June 6<sup>th</sup>, 2010.

The Court: And what was done then?

The Witness: I'm sorry. There was a congregational meeting part of-- and the purpose was to inform the congregation that the Session had excommunicated John Perry.

For the public record, ex-Covenant Pastor Jim Bachmann was also fired in 2016 after the false arrest of the Appellant, and after Pastor Bachmann was also accused of committing "*heinous sins*" by Covenant Ruling Elder Jack Bailey, former chief of staff for Missouri Congressman Todd Akin. - TR Vol 2 - 262

Scott Troxel continued to testify about unrepentant child-molester John Perry, "*heinous sins*," and how no report was made to Nashville Police. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 53 - 55. TR Vol 1 – Pgs 63-65.

Q. And so that was June 6<sup>th</sup>, 2010?

A. Yes. Uh-huh.

Q. And can you read what the pronouncement of judgment was?

A. Okay. Sure. It says where as John Perry has confessed committing heinous and repetitive sin against REDACTED and has not shown evidence of repentance, the Session of Presbyterian Church has declared he is excluded from it's acumen and cut off from the fellowship of the church. This Session has taken this action with sorrow and the desire to see him repent and return to Christ and the fellowship of his church.

Q. And that action was taken two years later.

A. Yes. Yes.

Q. No police was called.

A. No.

Q. Now, does it say in there-- does it say he has shown no evidence of repentance? is that what the line says?

A. Yes, it's what is says.

Q. So for two years, he's been in the church amongst leadership and you got there— private school up there that lots of children were coming to?

A. No, he was not in leadership.

Q. He had access to children and he was around them. And did you get out and tell everybody in the church he molested children.

A. Not that-- not from what I recall. He was given the opportunity. First of all, there is an opportunity for him to reconcile with his wife. And I believe, from what I recall is basically John just stopped engaging. He was no longer coming to church and basically was not responding to any of the overtures from the Session. It's part

of the process of discipline basically. And it was his lack of response that basically led to this decision, this action.

Q. And so it says he shows no evidence of repentance?

A. Uh-huh.

Q. And you all excommunicated him?

A. Correct.

Q. And turned him loose on the streets of Nashville without anybody knowing about him?

A. There was nothing-- from what we were informed, there was nothing that could be communicated as far as the police because **REDACTED** did not want to press charges.

Q. But you all have no problem talking to the police about me?

A. Correct.

Q. But your weren't hiding anything?

A. Nope.

Former Covenant Member Greg Lurie also provided a sworn declaration about Attorney Worrick Robinson, John Perry's "*safe house*," and John Perry's child sex abuse. Appellant provided Asst. DA Chandler Harris the exculpatory sworn declaration with discovery, but Asst. DA Chandler Harris continues to live in a fantasy land believing Appellant's child sex abuse allegations are a "*red herring, myths or ideations*." TR Vol 1 – Pg 69-70

"Under penalty of perjury, I state that I am competent to make this declaration and that this declaration is based on my own personal knowledge as follows: In the spring (March/April) 2002, my children were placed, by Covenant Presbyterian Church, in the house of John and Susan Ann Perry without my knowledge and against my wishes. Covenant Presbyterian Church referred to the Perry residence as a safe house and my children were placed there for approximately 30 days. Prior to my divorce on March 31, 2004, Worrick Robinson was an attorney for my wife, Carolyn Lurie. On Oct 14, 2004, Dr. Sam Sells wrote and provided me a letter to use in a court proceeding in which Worrick Robinson was the attorney for my wife, Carolyn Lurie. On March 4, 2007, I wrote and mailed a letter to John Perry to explain my feelings to him about **the harm he had done to my family and children in 2002 when my children were placed in his safe house**. On or about mid-May 2008 until approximately mid-



February 2009, I served 80 days in jail on consecutive weekends to complete my sentence imposed upon me by Judge Muriel Robinson, a relative of Worrick Robinson. In the summer of 2013, REDACTED called me regarding REDACTED and Covenant Presbyterian Church. During that conversation, REDACTED told me that REDACTED had been sexually molested over an extended period of time by REDACTED John Perry, and that the timing of John Perry's actions coincided with the same time my children were residing with the Perry's in the spring of 2002. REDACTED reassured me repeatedly that no wrongdoing was done to any of my children during their stay at the Perry's residence in the Spring of 2002 but had no irrefutable facts to support REDACTED claims. To date, no one from the Metro Police department has ever contacted me about the John Perry safe house or my children after Austin Davis provided Detective Michael Shreeve my contact information on or about December 11, 2012. Dated 8/8/14 and signed by Gregory C. Lurie."

Appellant's wife provided sworn testimony about the most protected child-molester "*safe house*" in the world. Ext. 5 – Motion For New Trial – 3 of 4 – Trial Transcript Vol 2 – Pge 167

"Okay. Well, and you knew there were certain-- there was-- you know there was a couple of kids that I was concerned that they might have autism. There was some kids that I thought they had behavioral problems-- there was one instant of a girl, a child whose behavior changed and I thought she might have been a victim of child sex abuse because she was showing all of the classical signs.

Q. What are some of those?

A. Well, in this case, I was asked by another parent to provide socks for the child because she had been cutting her legs and she had scars up and down the backs of her legs from the knee down. And that child had a sister who reported that she was very concerned about her sister because she had stopped sleeping in her bedroom and would only sleep in the hallway and she had-- she was kind of, she wouldn't talk to anyone and she was kind of antisocial after that. And yeah, she had to be put on medication.

For the public record, child-molester John Perry's REDACTED Ukraine, REDACTED, attended the Appellant's criminal trial while REDACTED was suing a bankrupt and financially destroyed Appellant in a "*defamation-invasion of privacy*" lawsuit for \$3

million. The Tennessee Supreme Court recently granted **REDACTED** a \$2.1 million default victory against the Appellant even though **REDACTED**, child-molester John Perry, DA Prosecution Witnesses Scott Troxel and Federal Judge John Bryant, continue to cover-up and protect John Perry's "safe house" where other vulnerable children were placed by Covenant Leadership. Appellant considered calling **REDACTED** as a witness during Appellant's criminal trial but Attorney Larry Crain had filed a "protective order" and **REDACTED** was sitting friendly with DA Prosecution Witnesses Scott Troxel and Federal Judge John Bryant so the Appellant did not wish to take a chance on being arrested in front of the jury during his criminal trial. Also of note, **REDACTED** was represented by child-molester John Perry's attorney, Larry Crain. Attorney Worrick Robinson also appeared at the courtroom entrance doors on or about the start of the judicial proceeding.

Appellant also provided Asst. DA Chandler Harris a copy of Susan Ann Perry's sworn divorce complaint stating that John Perry molested **REDACTED** which was filed with the court by Attorney Worrick Robinson on March 13, 2009. TR Vol 1 - Pgs 92-97.

"Wife fears for her safety and the safety of **REDACTED** unless Husband is restrained from molesting, harassing, assaulting, threatening, or harming her and/or **REDACTED** due to her Husband's past acts of abuse and molestation of **REDACTED**. Wife has the following ground(s) for divorce: a) The parties have irreconcilable differences; 2) Husband has been guilty of inappropriate marital conduct; 3) Husband has been guilty of such cruel and inhuman treatment or conduct towards her as renders cohabitation unsafe and improper.

Appellant's wife, Catherine Fleming Davis, also signed a sworn declaration about Attorney Worrick Robinson, John Perry's child sex abuse, and the grotesque abuse of Appellant's daughter which was provided in discovery to Asst. DA Chandler Harris. An excerpt from the sworn declaration is below. TR Vol 2 - Pg 184

"During the summer of 2012, the child-molestation victim began to contact me for a series of lunch and dinner meetings. **REDACTED told me she had been**

**molested approximately 25 times by John Perry when REDACTED was around 11 years old. REDACTED told me that REDACTED finally broke silence around July 11, 2007, after REDACTED turned 18 and REDACTED began telling friends, members of REDACTED, paid counselors, school officials and Covenant Leaders... Signed by Catherine Davis... Aug 7, 2014."**

Appellant also signed a sworn declaration about John Perry's child sex abuse crime. TR Vol 2 – Pg 177

**"During the summer of 2012, I met with the known molestation victim at my home for several hours. The victim told me REDACTED had been molested by John Perry approximately 25 times in multiple states when REDACTED was 11-13 years old. The victim told me that REDACTED began to speak out to private counselors, church members school officials, and church leaders after REDACTED turned 18 on July 11, 2007 while both of us were attending Covenant. The victim told me REDACTED lost weight down to 86 pounds and felt like REDACTED was losing REDACTED mind because no one believed REDACTED story and REDACTED almost jumped off a bridge downtown because REDACTED was still REDACTED enduring unimaginable anguish and suffering."**

Contrary to Nashville Police, DA Funk's Office, and Judge Steve Dozier's repeated statements that the statute of limitations has expired, there is no statute of limitations for child sex abuse across states lines under the Federal White-Slave Traffic Act (Mann Act) as child-molester Jeffrey Epstein learned, and most recently, Ms. Ghislaine Maxwell. To protect the Mann Act Federal crime cover-up effort at Covenant Presbyterian Church, Scott Troxel deliberately committed perjury by falsely testifying that the Covenant Session authorized him to write the June 27, 2008 "trespass" letter, even though the Covenant Session did not meet in June and Clerk of Session Scott Troxel or Asst. DA Chandler Harris did not produce any 2008 Covenant Board Minutes recording such authorization had ever been given.

On Aug 16, 2010, the Covenant Session authorized a similar type trespass letter which was recorded in the Covenant Board Minutes by Covenant Clerk of Session Ronald P. Kimery. Asst. DA Chandler Harris was provided this exculpatory information in discovery but General

Harris chose to disregard rock-solid information as he continued to pursue a reckless “*malicious prosecution*” of the Appellant. TR Vol 2 – Pgs 190-194.

“Pastor Bachmann presented a recommendation from the pastoral staff concerning the continuing harassment of the church leadership by Catherine Davis and Nancy Fleming. After discussion a motion was called. M/S/P Clerk to request by letter that Catherine Davis and Nancy Fleming not attend worship service and other church events. This request is based on their stated objective in such attendance being the reception of a public apology for past perceived mistreatment.

Appellant’s mother-in-law, Nancy Fleming, provided a sworn declaration about Covenant Leadership banning her and her daughter, Catherine Davis, and her granddaughter, Daisy Davis, from a public Sunday church service after the grandmother and mother had requested an apology for the Appellant’s banned, bullied, and molested young daughter. TR Vol 2 – Pgs 186-187

“Under penalty of perjury, I state that I am competent to make this declaration and that this declaration is based on my own personal knowledge as follows: On July 6, 2008, when I went to the front door to pick up my 13-year old granddaughter, Daisy, there were two unfamiliar men standing with her. On June 6, 2010, Daisy was desperate to end the shunning, harassment, and bullying she had endured at Harpeth Hall and elsewhere. Since no one was helping her, she wanted to return to Covenant to request an apology from Pastor Jim Bachmann with the hope that things might improve for her with other classmates who shunned her or were cruel to her. I agreed to go back to Covenant with her, my daughter and my grandson. On August 8, 2010, I asked JIM BACHMANN after a Covenant service to apologize for mistreating my family as I had also done before. He threatened me with a lawsuit. This was in the lobby on a service on Sunday. On August 15, 2010, Catherine, Daisy, Drew and I went to Covenant for a Sunday service. As we approached the sanctuary, we saw a Metro Police car parked in front of the entrance and it scared us. On August 22, 2010, after church at Covenant, WORRICK

ROBINSON actually chased after me in the parking lot. I told him to leave me alone because I was afraid of him. He also chased Catherine and Daisy who were with me. On Aug 29, 2010, three men ran to block me, Catherine and Daisy at the front entrance of the Covenant Sanctuary telling us we could not go inside. They were Tom Pulliam, Lee Bryant, and Herb Kneeland. I took out a piece of paper and wrote down their names. Daisy slipped by. Tom Pulliam eventually said we cannot stop you from going in, so we did. We left the service without speaking to anyone. Signed on August 7, 2014 by Nancy S. Fleming.”

Covenant Elder Herbert Kneeland was identified as one of the men who attempted to block a grandmother, mother and daughter from a public Sunday church service in violation of Article I Section 3 of the Tennessee Constitution, and Chapter 49 of the Presbyterian Church in America Book of Church Order. Herbert Kneeland also committed perjury before Judge Casey Moreland in a pre-indictment hearing when he also falsely testified that the Appellant had been “*served*” a 2008 trespass letter on the Appellant. TE Vol 5 – Pg 3

Herbert Kneeland committed perjury to wrongfully indict the Appellant on April 20, 2016, which ultimately led to the Appellant’s trial, conviction, sentencing, and wrongful 18 days in jail: “... **And we finally served him a no trespass letter in ’08....**” The transcript of the Casey Moreland court hearing does not even have the name of Judge Casey Moreland and the name of the prosecutor included in the official court document which is part of the Appellant’s appeal record. TE Vol 5 – Pg 3

Herbert Kneeland’s replacement witness, Federal John Bryant, willingly testified during the Appellant’s trial in full support of the fraudulent, unauthorized trespass letter even though he did not become a Covenant Elder until 2012, four years after Scott Troxel wrote the “*trespass*”

letter and a Mann Act Federal crime cover-up was initiated by Covenant Leadership. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Transcript of Trial - Vol 1 - Pg 95

Q. So that's four years after this letter was written in 2008 when you are actually becoming an elder.

A. Right.

Q. So would it be safe to say that you were pretty much in the dark about a whole lot of stuff that had gone on between 2002 and 2012.

A. I didn't know much about it at all until I became an officer in the church.

Federal Judge John Bryant's sworn testimony was critical to the "*malicious prosecution*" of the Appellant because Federal Judge John Bryant "*outranked*" everyone in the courtroom, especially the demonized potential "*church shooter*" Appellant. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Transcript of Trial - Vol 1 - Pgs 89 - 90.

Judge Bryant: "And I think in fairness part of the alarm was because that just in December 2012 was the shooting of the school children at the Sandy Hook Elementary School in Connecticut by a man named Adam Lanza which was all over the news, it was horrible thing. And think it was fresh in everybody's mind at the time."

Judge Bryant: "We hired a private security guard to come to church on Sunday morning during worship wearing a uniform and having a marked patrol car."

Also, Asst. DA Jenny Charles was very clever to poison the jury against the Appellant as a "*threat*" when she told a jury that trusted and popular WSMV TV Anchorwoman Demetria Kalodimos had asked the Appellant to stop following her, without actually summoning Demetria Kalodimos to testify under sworn oath subject to cross-examination by the Appellant. Exhibit 5 – Motion for New Trial – 3 of 4 – Trial Transcript Vol 2 - Pgs 21-22

Q. I know Demetria Kalodimos asked your husband to stop following her.

Asst. DA Jenny Charles ~~from~~ poisoned a trusting jury without the sworn testimony of Demetria Kalodimos but Judge Steve Dozier did not stop or interrupt DA prosecution questions as he repeatedly did with the Appellant during the trial.



Appellant remains hopeful that Judge Steve Dozier, Asst. DA Jenny Charles, ex-WSMV TV Anchor Demetria Kalodimos, Herbert Kneeland and Federal Judge John Bryant will one day read Article I Section 3 of the Tennessee Constitution:

“That all men have a natural and inalienable right to worship Almighty God according to the dictates of their own conscience; that no man can of right be compelled to attend, erect, or support any place of worship, or to maintain any minister against his consent; that no human authority can, in any case whatever, control or interfere with the rights of conscience; and that no preference shall ever be given, by law, to any religious establishment or mode of worship.

Appellant remains hopeful that Judge Steve Dozier, Asst. DA Jenny Charles, ex-WSMV TV Anchor Demetria Kalodimos, Herbert Kneeland and Federal Judge John Bryant will one day read the Presbyterian Church in America Book of Church Order, Chapter 49, The Ordering of Public Worship. TR Vol 2 – Pg 220

“All who attend public worship are expected to be present in spirit of reverence and godly fear, forbearing to engage in any conduct unbecoming to the place and occasion. Since the family, as ordained by God, is the basic institution in society, and God in the Covenant graciously deals with us, not just as individuals but also as families, it is important and desirable that families worship together.”

DA Star Prosecution Witness Scott Troxel committed perjury before Judge Steve Dozier to convict the Appellant even though he also testified that he had never seen the secular property deed registered with the State of Tennessee that was provided to Asst DA Chandler Harris by the Appellant. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 43-

44

Q. Is the Presbyterian Church in America a private club or is an open club, do you have a public call to worship, do you have a private call to worship? Exactly what goes on at the Presbyterian Church of America? How does it operate on Sunday?

A. It's an open.

Q. Anybody can come?

A. Yes, uh-huh. Unless they have been specifically told they are not welcome as we communicated to you. That's definitely the exception.

Q. Your name is on the letter, is your name on the property deed?



A. No. Is the sessions named on the property deed?

A. I don't know.

Q. You don't know. You are a real estate guy and you're coming in to court and you don't know? You've never seen the deed?

A. I've not looked at the deed, no.

Q. Don't you think that the Clerk of Session, it's kind of important for you to know things like that, especially if you are banning people?

A. I don't think it's important for me to read the deed, no, not as the clerk of the Session.

Judge Steve Dozier, Asst. DA Chandler Harris, and Asst. Da Jenny Charles had zero interest in being "*fair-minded and impartial*" to present a secular property deed in a secular court, or to genuinely search out what Scott Troxel and Covenant Leaders were hiding beneath Scott Troxel's fraudulent, unauthorized trespass letter. Neither were two Metro Nashville Police Officers who also appeared in Judge Steve Dozier's courtroom to provide supporting testimony for Scott Troxel's unauthorized counterfeit trespass letter of June 27, 2008.

Metro Nashville Police Officer James Smith testified against the Appellant in support of Scott Troxel's unauthorized letter. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript - Vol 1 - Pg 122

Q. Okay. And was Mr. Kneeland concerned that Mr. Austin Davis was on church property.

A. Yes.

Q. Okay. And did you learn that Mr. Davis had been warned not to go on church property before Oct 25st of 2015?

A. Yes, I did.

Q. And did you learn that the church had mailed a letter dated June 27<sup>th</sup> of 2008 to Mr. Davis telling him to say off the church property.

A. Yes.

Metro Nashville Police Officer James Smith was not as concerned about a genuine child sex abuse cover-up crime as he was about an alleged trespass crime, and Judge Steve Dozier did not allow the Appellant to play the Oct 25, 2015, recording for Officer James Smith and the jury. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 131

By Mr. Davis:

Q. Were you-- you were not with me very long, but I was with Officer Daughtery for a while, a good while. And I actually have a recording of all of that if we can enter that in to—

The Court. What do you have questions to this officer?

Mr. Davis: Well, I don't know-- I'm pro se, so I don't know what I am doing, I'm just asking. So if I ask him a question, I don't know whether I can submit a recording into the Court so the jury can listen to what was said when all of this happened.

The Court: I am just wanting you to ask questions, whatever questions you have of Officer Smith.

Judge Dozier did not allow the Oct 25, 2015 tape recording played for the jury and Officer Smith was not concerned about a potential child sex abuse cover-up within the Nashville Police Department. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 131-133.

By Mr. Davis:

I reported a child sex abuse crime to the police that were there that day. While you were back there talking, did anybody tell you about that that or anything?

A. I know you stated something and I provided a number that would relate to that.

Q. Is that no an issue of concern with the police department? Is it not -- can not report it just to officers if i see one and tell them I want to report a crime? Is it the duty of the citizen to keep doing it or does anybody actually get involved that's a cop?

A. That's a what?

Q. That's an actual cop, you know, that you give information. Do they actually go do anything or does it fall back on the citizen to keep driving it and he has to write 10,000 emails to everybody that everybody ignores?

The Court: I think he is asking: Can he report to you when you are there on another call a concern that he has about a-- some prior child sexual abuse?

The Witness: Okay. Yes, you can report something, but my memory recalls that you stated you had already reported it. Which I provided the number to the detective, which would have handled that case or a detective that can recall that case.

By Mr. Davis.

A. Yeah. I think I was saying that I didn't trust what had been done on that and was looking for other avenues hoping there had been somebody within the police department that might care about children?

Judge Steve Dozier suppressed the Oct 25, 2015 audio recording to be played for Officer

James Smith and the jury, as he continued to allow Asst. DA Chandler Harris and the Nashville Police Officers to have superior advantage in the prejudiced courtroom.

Nashville Police Officer John Daughtery was also far more interested in a fraudulent trespass case than a genuine child sex abuse cover-up crime connected to Presidential Politics.

Exhibit 5 – Motion For New Trial Hearing – 3 of 4 – Trial Transcript Vol 1 – Pgs 152-153

By Mr. Davis

Q. And I spent some time telling you about Mike Huckabee and the child molester cover-up that had gone on there, correct?

A. That was one of the topics you covered.

Q. Does it seem normal or odd that I'm in court and that nobody involved in the child sex abuse case is in court?

A. From what I understand, we are here on an aggravated trespass, so...

Q. Is it possible that people lie to police and get police to do bad things but they made up? The police themselves may not be bad, but is it possible that someone with a lot of power, federal judge was able to get the police to do the dirty work for them?

A. Are you asking me if it's possible?

Q. Yeah, is it possible.

A. I'm mean, I'm sure it's possible.

Federal Judge John Bryant testified under sworn oath that Covenant Leaders were concerned about child-molesters while he still actively participated then-- and now-- in an ongoing Mann Act Federal crime cover-up. Oklahoma child sex abuse advocate, Wade Burleson, visited Nashville in 2014 and spoke in person with Federal Judge John Bryant about the truthfulness of the Appellant in exposing the John Perry child sex abuse cover-up, however Federal Judge John Bryant was relentless to support the "*malicious prosecution*" of the Appellant in Sept 2017 as a key sworn witness called to the trial without a subpoena for his appearance. Exhibit 5 – Motion For New Trial – 2 of 4 – Trial Transcript Vol 1 – Pg 117

Q. You guys concerned about child-molesters?

General Harris: Objection, your honor.

The Court: Do you have an answer to that. You can answer it.

The Witness: Sure. We are always concerned about the safety and welfare of the children at the church.

To date, the child sex abuse Mann Act Federal crime cover-up is still on-going as the Appellant writes this brief. Ex-Cop and Covenant Deacon Rob Michaels just appeared on TBN's Huckabee show as one of "*Huck's Heroes*" on July 25, 2020, even though Rob Michaels was a major Covenant Leader during a chaotic period of time when Greg Lurie's vulnerable children were placed in John Perry's safe house. John Perry is a co-author on two books with Gov. Mike Huckabee, and his ex-wife, Susan Ann (Perry) Clark, is a member of Stephens Valley Church where Rob Michaels also attends, and is possibly a loyal church member in Pastor Jim Bachmann's new church.

Appellant was repeatedly defamed as a potential church shooter to protect child-molester John Perry and his "*safe house*" for other children, and former Covenant Member Greg Lurie was also repeatedly defamed as a potential security concern when his children were first placed in child-molester John Perry's "*safe house*." This is a small excerpt from a sworn declaration by the Appellant on Aug 10, 2014, which was provided to Asst. DA Chandler Harris during the exchange of discovery:

"In a deacon meeting sometime shortly after March 2, 2002, Deacon Robert Michaels briefed the deacons on a security concern pertaining to a member of the church, Greg Lurie. Deacon Michaels advised the deacons that a church member might harm his wife on the church property and notified all of us to be on high alert. I spoke with Deacon Michaels about his security briefing to confirm the member was Greg Lurie since rumors were spreading rapidly about Greg Lurie which I felt were hysterical and unwarranted." TR Vol 2 – Pg 169.

Greg Lurie was not a "*threat*," and Deacon Rob Michaels and Covenant Leaders knew the Appellant was not a "*threat*" because the Appellant did not own a gun and the Appellant had secret service clearance to be with the Gore Family at the Carthage Farm during the Clinton-Gore administration and the 2000 Presidential Election.

Appellant's wife testified about some of this during the Appellant's prejudiced criminal trial. Exhibit 5 – Motion For New Trial Hearing – 3 of 4 – Trial Transcript Vol 1 - Pg 171-172

Q. Did you get—did you ever take people to church.

A. A lot of people, yes.

Q. Who did you take?

A. I took a lot of people. I took friends, neighbors, you know, I don't know. I think I, you and were pretty well known for bringing the Gores to church and for also adding the congregation a lot especially you but I was with you in that, so yea.

Q. Were people happy about that?

A. Which part?

Q. When I took Albert and Pauline Gore to church, drove to Carthage to get them, were they happy about that?

A. No, not particularly.

Q. Anybody say anything that was very unloving and unwelcoming?

A. Yes.

For the public record, Appellant does not own a gun and is not a threat to anyone. Asst. DA Chandler Harris and Asst. DA Jenny Charles pursued a reckless "*malicious prosecution*" of the Appellant even though they both knew that the Appellant was not a danger or threat to anyone, and even though Federal Judge John Bryant was subtle to scare and frighten the jury with shrewd testimony about Adam Lanza and the Sandy Hook school shooting. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 89 - 90.

Asst. DA Chandler Harris brought in Federal Judge John Bryant as a last-second replacement witness for Covenant Elder Herbert Kneeland to certify the authenticity of Scott Troxel's powerless, unauthorized 2008 trespass letter to the Appellant. General Harris also wanted the jury to know that the Covenant Elder was a Federal Judge who "*outranked*" a lowly prosecutor, thereby also "*outranking*" the alleged "*stalker-threat*" Appellant, and the sitting jury with in his 33 years of knowledge and experience with the law. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 – Pgs 83-84.

Q. Good afternoon, sir. Will you please state your name for the Court?

A. My name is John Bryant.

Q. And where are you from.

A. From Nashville.

Q. And what do you do for a living.

A. I'm retired.

Q. What was your previous occupation.

A. I was a practicing lawyer for 33 years and then I spent ten years serving as a magistrate judge for the United States District Court here in Nashville.

Q. So you would have been a federal— federal magistrate; is that correct?

A. That's correct.

Q. Because federal magistrates outrank prosecutors, I'm going to call Judge Bryant, if that's okay?

Judge Steve Dozier and last-minute government witness, Federal Judge John Bryant, were former church members and friends at Woodmont Baptist church prior to John Bryant becoming a Covenant Elder in 2012. Judge <sup>Dozier</sup>~~Bryant~~ was transparent to disclose his friendship with John Bryant during Appellant's cross-examination of Federal Judge John Bryant, but Judge Dozier did not disclose his friendship with Covenant Member Worrick Robinson, or his blood kin relationship to his father, Nashville Police Major Tom Dozier, or his blood kind relationship to his Uncle Don Dozier, a former police officer and Covenant Member at the time of the Appellant's arrest thereby denying the Appellant a fair, impartial trial. Exhibit 5 – New Trial

Motion – 2 of 4 – Trial Transcript Vol 1 - Pg 94

Q. How -- how did you come -- how did you happen to come?

A. Well, as my -- I blame it on my wife. We were Baptist and had been attending Woodmont Baptist for many, many years. In fact, we married there and raised our children there. But my wife primarily became a little bit disenchanted with the church there and she was looking for another church. And we had friends at Covenant, so she visited there, liked what she heard and she took me there basically, and took me there basically in September of 2007.

The Court: Just so everyone knows this. At some point our membership at Woodmont crossed.

The Witness: Yes.

The Court: Okay.

Mr. Davis: Woodmont Baptist?

DA Star Prosecution Witness Scott Troxel, Two Nashville Metro Police Officers, and Federal Judge John Bryant, were all put on the stand by Asst. DA Chandler Harris to “*paint the pig with lipstick*” to transform Scott Troxel’s powerless, unauthorized June 27, 2008 trespass letter into an authentic, authorized, “*official*” notice, but nothing can ever erase the rock-solid truth that Covenant Clerk of Session Scott Troxel was never authorized by the Covenant Session to write a “*trespass*” letter to the Appellant supposedly banning him from the Covenant church property.

Clerk of Session Scott Troxel cannot blame someone else for there being no Covenant Board Minutes to support his unauthorized threatening letter because he was the Clerk of Session at Covenant and he provided sworn testimony during the Appellant’s trial about his role and responsibilities keeping the minutes of the Covenant Meetings. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 – Pgs 22-23.

Q. Okay. And in the Session did you also hold a position?

A. Right. I was considered the – I was the Clerk of Session which you can think of as the secretary and so-- the clerk is basically responsible for the minutes of the meetings, also receiving correspondence from members or sending out correspondence from the Session.

Asst. DA Chandler Harris also ignored all evidence provided to him about a child sex abuse cover-up crime and the DA Prosecution Team repeatedly mocked the child sex abuse allegations as “*myths, ideations, and a red herring.*” Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 78. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Trial Transcript Vol 2 - Pg 121. TR Vol 3 – Pg 399

Q. Okay. And Mr. Davis talked about some of the **myths**, I believe that he believes the church is hiding from him or something. Are you aware that Mr. Davis ever attempted to subpoena any of this information.

A. I’m not aware of it.

“It is not a legal affirmative defense, nor is it any defense to this crime that Mr. Davis sought to go uncover this massive conspiracy cover-up of this child-molestation going on. **It is a red herring.**”

“The defendant has engaged in correspondence with several members of the MBA community that he believes are involved in his other **ideations** of child abuse at Covenant Presbyterian Church.”

Asst. DA Chandler Harris mocked and taunted the Appellant during his closing arguments about the mythical child sex abuse allegations. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Trial Transcript Vol 2 - Pg 123

“If he is this white headed, virtuous Knight of all that is right or wrong in the world, assuming this is true, what motive, if any, would a person have to continue to discuss to allure people to this apparent problem which no longer exists? A Knight he is, but a Knight I submit ladies and gentleman, in the mold costume of donkey hood. He’s swinging at windmills for no other reason than to jack with this people at this church.”

On Feb 9, 2018, Judge Cheryl Blackburn submitted to no judicial boundaries when she actually banned the Appellant, and his family (without notice or legal representation), from communicating with the entire MBA community for two months, with the no contact ban including a banned, bullied and molested former Harpeth hall student, and a recent graduate of MBA who was inducted into the Martin Luther King society at MBA. TE Vol 12 - Pg 2-3

General Harris: And so the state would ask that no member of the Davis family communicate with the school.

The Court: Right, No. Right. We have to have this hearing.

Mr. King: I don’t have any problem with that. She is not party to this probation.

The Court: Okay. But I don’t want any communication with MBA at this point until we have a hearing.

Mr. King: Okay. You’re saying from anyone—

The Court: Right. Let’s just stop. That’s all I want. Until we have a hearing then we can talk about it all then.

Asst. DA Chandler Harris added further insult to the Appellant’s defamed and humiliated family by mentioning the Appellant’s banned, bullied, and molested daughter in his closing



statements, even though the DA's Office did not care the slightest bit about a molested girl victim who was brave to take the witness stand in a cold-hearted, prejudiced Davidson County criminal courtroom. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Trial Transcript Vol 2 - Pgs 123-124

“And I submit ladies and gentleman, you know, this issue of bullying, with all of this, you know take it as face value. No one is saying it didn't happen. No one is saying that life wasn't hard on Ms. Davis, on the Davis children, on any of this. But what purpose do we serve by continuing to perpetuate the problem which cause it had bullying to exist in the first place? If you are Daisy Davis and your father continued to do this, perpetrating the problem as you already have, what purpose does that serve other than for Austin Davis to continue to exert and maintain control, to scare these folks, these church, at this church over and over and over again? Do not be distracted by any of this.”

Asst DA Chandler Harris also said this. TE Vol 10 – Pg 7

“This Court has real victims and violent offenders that come through day in and day out for which the rules of the criminal justice system are written to protect both victims and defendants. That is not the circumstance now. We have someone who is playing games with the criminal justice system and playing games with the church for the better part of the last 10 or 11 years. And the state would respectfully request that end today. If the Court is inclined to grant probation, while Judge Bryant certainly is taken a very fair and equitable position on the part of the church, the State would ask for even stricter conditions. That would be Mr. Davis not be able to have any internet whatsoever.”

Per Scott Troxel's sworn testimony. child-molester John Perry was provided protection by plain clothed officers (off duty police officers), in contrast to General Harris' request for the Appellant to have a permanent conviction on his record and denied access to the internet. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 - Pg 75-77.

A. We had plain clothes officers present.

Q. Plain clothed police officers?

A. Or security personnel.

Q. I hope you know that is a big question because it's already been information that are-- are you telling me that they are plain clothed officers?

A. I don't recall if they were plain clothed officers on duty or if they were security personnel. I don't recall specifically which, but we did feel that there was a level of concern that we could not take a chance on your intentions.

Q. There had been plenty of other situations where churches had been lax in providing that control on people. Do there were in for-- they were protecting John Perry and others from me, is that what you are saying?

A. Protecting everyone, whoever needed to be protected.

Q. John Perry is a member of -- he was still a member of the Diaconate, so he's officially inside of the rule where he can—

General Harris: I object.

The Court: Okay. What is your question you're asking.

Mr. Davis: The church is being protected by a plain clothed officer. I'm just asking the question: Are you protecting John Perry with cops?

The Court: Okay. He wants to know if John Perry was protected by plain clothed officers.

The Witness: Basically anybody present would have been protected or hopefully.

Mr. Davis: Okay. Thank you.

Child-molester John Perry is still protected by Nashville Police Chief and Attorney Steve Anderson, Attorney Worrick Robinson, Judge Steve Dozier, Judge Cheryl Blackburn, and these members of law enforcement and the legal profession did nothing to protect the integrity of the Davidson County Criminal Court system, in submission to the The Tennessee Constitution and the Tennessee Supreme Court's Judicial Conduct Rule 10B which set high ethical standards for attorneys and judges in the State of Tennessee.

## Argument

The Honorable Andy D. Bennett cited some law and cases in a related child sex abuse lawsuit (**REDACTED**) which the Appellant will adopt for this argument since the Appellant did not receive a fair, impartial trial, or for that matter, the Appellant did not receive any fairness since 2008 when Attorney Worrick Robinson began a nightmare 12-year experience for the Appellant's family by providing legal counsel to Covenant Elder Scott Troxel for the June 29, 2008 unauthorized trespass letter which was sent to the Appellant via U.S. Mail.

Per a previous legal opinion by The Honorable Andy D. Bennett, the Tennessee Supreme Court has said that: "The right to a fair trial before an impartial tribunal is a fundamental constitutional right." *State v Austin*, 87 S.W.3d 447, 470 (Tenn.2002). Article VI Section 11 of the Tennessee Constitution provides, "No Judge of the Supreme or Inferior Courts shall preside on the trial of any cause in the event of when he may be interested..." This provision is intended "to guard against the prejudgment of the rights of litigants and to avoid situations in which the litigants might have cause to conclude that the court had reached a prejudged conclusion because of interest, partiality, or favor." *Austin*, 87 S. W.3d at 470. We have recognized that it is important to preserve the public's confidence in a neutral and impartial judiciary. *Bd. Of Prof'l Responsibility v. Slavin*, 145 S.W.3d538, 548 (Tenn.2004).

*Bean v. Bailey*, 280 S.W.3d 798, 803 (Tenn. 2009). In furtherance of this right, the Tennessee Supreme Court has established a Code of Conduct for Judges and a specific procedure for seeking the recusal of judges. *See* Tenn. Sup. Ct. R. 10, 10B.

Tenn. R. App. P. 36(b) provides some leeway to the advantage of a citizen Appellant since many errors and issues of prejudice may have occurred to the harm and damage of the Appellant, but the Appellant may not be able to clearly know about or be able to identify all of

them in this brief. The Court apparently has power to do “substantial justice” for the ordinary, common citizen if judges dedicated to high ethical standards determine that the “substantial rights” of a party have been adversely affected: “When necessary to do substantial justice, an appellate court may consider an error that has effected the substantial rights of a party at any time, even though the error was not raised in the motion for a new trial or assigned as error on appeal.” Additionally, Tenn. R. App. P. 13(b) expressly states that the appellate court “may in its discretion consider other issues in order, among other reasons: 1) to prevent needless litigation; 2) to prevent injury to the interests of the public; and (3) to prevent prejudice to the judicial process. See also *Bell v. Todd* 206 S.W.3d 86, 90-91 (Tenn. Ct. App 2005).

Tennessee Courts have repeatedly maintained that “Public confidence in the performance and impartiality of the judiciary is maintained only when judges rigorously adhere to the Code of Conduct. Violations of the Code, if left unaddressed, diminish public confidence and injure the entire judicial system.” *In re Bell*, 344 S.W.3d, 304, 320 (Tenn. 2011) (quoting *In re Williams*, 987 S.W.2d 837, 844 (Tenn 1998)). Specifically the Tennessee Supreme Court has said, “if the public is to maintain confidence in the judiciary, cases must be tried by unprejudiced and unbiased judges.” *Davis v. Liberty Mut. Ins. Co.*, 38 S.W.3d 560, 564 (Tenn 2001). The State’s interest in preserving public confidence in the judiciary has even been described as “compelling.” *Bd. of Prof’l Responsibility v. Parrish*, 556 S.W.3d 153, 166 (Tenn. 2008) (quoting *Disciplinary Counsel v. Gardner*, 793 N.E.2d 425, 432 (Ohio 2003)). Furthermore, “preservation of the public’s confidence in judicial neutrality requires not only that the judge be impartial in fact, but also that the judge be perceived to be impartial.” *Kinard v. Kinard*, 986 S.W.2d 220, 228 (Tenn. Ct. App. 1998).

Appellant contends that all three judges involved in the Appellant's case should have voluntarily recused because of the power, relationships and influence of Attorney Worrick Robinson: ex-Judge Casey Moreland (now serving time in Federal prison for public corruption; Judge Steve Dozier; and Judge Cheryl Blackburn. The Tennessee Constitution promises a citizen a fair, impartial trial, but a trial against a peaceful citizen of Tennessee is inherently unfair if it is built on a false trespass letter, false arrests, false indictments, false sworn testimony, and false judicial proceedings, controlled and managed by stealth judges who were clearly prejudiced against the Appellant. Appellant was wrongfully arrested, indicted and convicted of a crime he did not commit, and Appellant's innocence should immediately be declared for the public interest of 6.5 million Tennesseans, and to promote and preserve the honor and integrity of the Tennessee Judicial System.

### **Conclusion**

Appellant is innocent and prayerfully makes request for the Honorable Court to immediately declare his innocence. Appellant also prays for Attorney General Herbert Slatery and/or the Honorable Court to investigate Steve McNair's unsigned grand jury report, and former Nashville Police Officer Richard Hillenbrand, who was involved in the biggest "sex-cocaine" scandal in Nashville Police Department history, and who served as Steve McNair's grand jury foreman.

Respectfully Submitted,



Willie Austin Davis - Citizen  
221 31<sup>st</sup> Ave. North Apt# 135  
Nashville, TN 37203  
615-999-8190 [fmdshiloh@aol.com](mailto:fmdshiloh@aol.com)

**CERTIFICATE OF SERVICE**

I, Willie Austin Davis, hereby certify that a true and exact copy of the foregoing motion has been forwarded by United States Postal Service, first class, postage pre-paid, on Aug 7, 2020, to the following parties:

General Benjamin A. Ball  
Office of the Tennessee  
Attorney General  
301 6<sup>th</sup> Ave. North  
Nashville, TN 37243



Willie Austin Davis, Pro Se  
221 31<sup>st</sup> Ave. North Apt# 135  
Nashville, TN 37203  
615-999-8190 [fndshiloh@aol.com](mailto:fndshiloh@aol.com)



# State of Tennessee

TWENTIETH JUDICIAL DISTRICT

THOMAS W. BROTHERS,  
JUDGE  
SIXTH CIRCUIT COURT

404 METROPOLITAN COURTHOUSE  
NASHVILLE, TENNESSEE 37201  
(615) 862-5917

September 27, 2018

General Glenn Funk  
Washington Square, Suite 500  
222 2nd Avenue North  
Nashville, Tennessee 37201-1649

Dear General Funk,

Please find enclosed DVDs of the trial testimony in the recent case of *Redacted* versus Austin Davis, *R*. The plaintiff testified under oath that *R* had been molested as a child by *Redacted*. During the trial the defendant made numerous complaints that the police and authorities have refused to investigate these claims. I believe it is my obligation to provide this information to your office in order that you may determine whether any further review or investigation is required. Please maintain the identity of the plaintiff, "*R*," confidential unless *Redacted* authorizes otherwise. I am advising both parties of my actions by copies of this letter.

Thank you and please do not hesitate to let me know if I can provide any other assistance.

Sincerely,

Thomas W. Brothers

CC: Larry Crain, attorney for plaintiff  
Austin Davis, defendant



Covenant  
Pastor Larry  
Ferris →  
KNEW IN  
April 2008

Page 22

1 Q. In the injunction hearing, R answered the  
2 question that R had been meeting with you for ten  
3 years, so that would take it back to 2006.  
4 Did you ever counsel with R before?  
5 A. No, sir, we started in April of 2008.  
6 Q. April 2008. Okay. And in the injunction  
7 hearing, you said that Larry Ferris was the one that  
8 contacted you from Covenant.  
9 A. Uh-huh.  
10 Q. So how did it all come about? What is it  
11 exactly that happened because you got contacted before  
12 and then met with R and R?  
13 A. Well, so what happened is Mr. Ferris called me  
14 on the phone and said, "Hey, we have something that  
15 just came up in our church. Do you have room for a  
16 new client?" And I said, "Yes, I do." And he told me  
17 a little bit about what had happened. And so then we  
18 made the appointment, and who came to the first  
19 appointment was both R and R.  
20 Q. Do you know why he picked you as a person to  
21 contact?  
22 A. My understanding was that he called a friend  
23 of mine who is also a therapist, and she couldn't take  
24 them at first and gave him my name. And otherwise, I  
25 don't have any idea why I got the call.

Page 24

1 he?  
2 A. Well, he was. He's not been in the program  
3 since I've been there.  
4 Q. He wasn't in the program back in 2008?  
5 A. Well, I don't know if he was there in 2008. I  
6 only started working there, I believe, in 2012 or so.  
7 Q. In the lawsuits, they've given the ages 11 and  
8 then they changed it; they went to 12. Do you know  
9 what the age was?  
10 A. I believe the age when R was first sexually  
11 abused -- is that what you're asking me?  
12 Q. Uh-huh.  
13 A. Was 11.  
14 Q. Eleven? The lawsuit says -- uses the word  
15 "incident," which seems to indicate it's only one  
16 time. Is it one time or is it multiple times?  
17 A. Multiple times.  
18 Q. Is it constrained just to Tennessee?  
19 A. No.  
20 Q. What other states?  
21 A. I'm not sure what other states there are, but  
22 I think some of the incidents occurred outside of the  
23 state of Tennessee.  
24 Q. Did R go over that or give you any  
25 information on those states, where it was?

Violated  
Federal  
Mann  
Act

Page 23

1 Q. Do you know any of the people that are over in  
2 Covenant in leadership?  
3 A. No I now, or did I then?  
4 Q. Did you then?  
5 A. I know Larry because he would frequently --  
6 actually, that was probably the beginning of me  
7 getting to know him and him referring clients to me.  
8 Q. Did you know Joe Rades who happened to be kind  
9 of in the mental health --  
10 A. I did not know Joe Rades. I did not know him.  
11 Q. Is Mr. Anderson Spickard -- is he over at  
12 Vanderbilt in the area that you're in?  
13 A. Yes. Are you talking about Anderson Senior or  
14 are you talking about Anderson -- are you talking  
15 about Andy Spickard or are you talking about  
16 Anderson --  
17 Q. The elder, Anderson. The one that wrote the  
18 book, "Tying the Knot."  
19 A. And he was he was at Vanderbilt? What's --  
20 help me.  
21 Q. When you were at -- I thought you said you  
22 were at the Center for Professional Health. Was that  
23 Spickard?  
24 A. Yes.  
25 Q. And he's in that program or something; isn't

Page 25

1 A. Yes, sir.  
2 Q. The reason I'm asking is because there's laws  
3 in different state and different statutes of  
4 limitations in other states, and so just curious if it  
5 got reported in the other states.  
6 A. Well so, let me talk a little bit about the  
7 whole concept of reporting. When the client came to  
8 me, R was 18 years old. And because R was  
9 18 years old, I actually didn't have to report it, but  
10 I did call DCS, and I said, "I have a child who was  
11 sexually abused as a minor, now R 18; what do I  
12 do?" And they said that they do not handle cases  
13 after a child turns 18.  
14 Q. So what happens to the child molester?  
15 MR. CRAIN: Objection; calls for legal  
16 conclusion.  
17 You may answer, if you know.  
18 THE WITNESS: It would be up to the  
19 person who was sexually assaulted to bring charges.  
20 BY MR. DAVIS:  
21 Q. I mean, I'm not in this world, in this realm  
22 at all. I'm not trained; I'm not a professional.  
23 You're obviously a professional now trained in the  
24 medical world. I'm just an average person.  
25 Is child -- and there are privileges that are