



Nashville Police Chief John Drake

Question For Chief Drake: Do you tolerate the harassment of a 13 year old girl on July 6, 2008, or are you prohibited from investigating like the Community Police Oversight Board? (See Jim Bachmann lawsuit on next page).



Worrick Robinson

Statement from Interim Chief John Drake on Silent No Longer TN Material
8/11/2020

FOR IMMEDIATE RELEASE

The following is a statement from Interim Chief John Drake concerning allegations brought forward last week by Silent No Longer TN:

“I want to be clear that I and the Metropolitan Nashville Police Department have absolutely no tolerance for sexual harassment or sexual misconduct. Any allegation of that nature against any police department employee will be taken very seriously and investigated.”

After reviewing certain material this afternoon from Silent No Longer TN, the MNPDP joined Mayor Cooper in asking District Attorney General Glenn Funk to request an independent TBI investigation of an allegation of sexual assault by one employee in 2016. General Funk concurred with this request.

The Office of Professional Accountability is examining the Silent No Longer TN report for policy violation allegations that have not been previously investigated by the police department. Many have. We will take action against those found to have violated our rules.”



Worrick Robinson’s
Toxic Police Dept.

Chief Drake was first informed about the John Perry child-molester and Mann Act Federal crime cover-up almost a year ago on Sept. 4, 2019. In fairness to Chief Drake, maybe thug liars within the toxic Nashville Police Department also told Chief Drake lies about the on-going cover-up? Only time will tell if Chief Drake is the real deal who does not tolerate the sexual harassment of women, or little girls, or if the toxic problem is unfixable in Worrick Robinson’s Police Department?

-----Original Message-----

From: fmdshiloh@aol.com

To: john.drake@nashville.gov; benjamin.rogers@nashville.gov

Sent: Wed, Sep 4, 2019 11:00 am

Subject: Rev. Billy Graham - DCSO Sgt. Solomon Holley - Judge Cheryl Blackburn

Below is more information on Rev Billy Graham, Grand Juror DCSO Sgt. Solomon Holley, and a New Trial Motion before Judge Cheryl Blackburn:

<https://www.keepandshare.com/doc15/20975/2019-1s-sept-1-rise-of-a-titan-president-trump-gov-bill-lee-ag-herb-slatery-the-family?da=y>

2012 – Austin Davis reported child-molester John Perry to Nashville Police. 2013 – Nashville Police protected child-molester John Perry and a Mann Act Federal crime cover-up by lying to 2000 Covenant Members: "There is nothing to these claims." With Nashville Police encouragement, 2000 Covenant Members became institutional participants in a Mann Act Federal crime cover-up which is still on-going in 2020.

IN THE CIRCUIT COURT OF DAVIDSON COUNTY
AT NASHVILLE, TENNESSEE

FILED
2014 JUL 23 PM 2:35
D. R. ROCHER, CLERK
DK

AUSTIN DAVIS,

Plaintiff,
vs.

Case No. DP
JURY DEMANDED

COVENANT PRESBYTERIAN
CHURCH OF NASHVILLE; NASHVILLE
PRESBYTERY, P.C.A.; PRESBYTERIAN CHURCH IN
AMERICA (A CORPORATION); STEWART JAMES
(JIM) BACHMANN, JR,

Defendants,

This 2014 lawsuit was filed three years before MBA Headmaster Brad Gioia gaslighted Austin Davis with unneeded security precautions and reported Austin Davis to Nashville Police on Oct 20, 2017. Austin Davis was jailed in retaliation for 18 days to protect a Mann Act Federal crime cover-up.

COMPLAINT FOR DAMAGES

Plaintiff, Austin Davis complaining of Defendants, brings this cause of action for the recovery of damages based on the Defendants' violations of common law negligence, intentional infliction of emotional distress, negligent infliction of emotional distress, false light invasion of privacy, and defamation; whereby, Plaintiff shows as follows:

1. Plaintiff, Austin Davis is an adult citizen and resident of Davidson County, Tennessee.
2. Defendant, COVENANT Presbyterian Church of Nashville (hereafter "COVENANT") is a non-profit corporation organized and existing under the laws of the State of Tennessee and maintains a principal place of business in Davidson County, Tennessee at 33 Burton Hills Boulevard in the Green Hills Community. Its membership, consisting of approximately 2000 members, annually donates approximately \$5,000,000.00 USD a year, tax-free, for the operating budget.
3. Defendant, NASHVILLE PRESBYTERY, Presbyterian Church in America (P.C.A) (hereafter "NASHVILLE PRESBYTERY") is an unincorporated organized body of churches existing under the laws of the State of Tennessee; same possessing actual and/or apparent au-

Jim Bachmann, Worrick Robinson, and Worrick Robinson's toxic police department are still protecting child-molester John Perry and a Mann Act Federal crime cover-up in 2020.

FILED

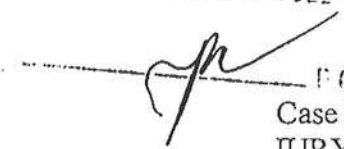
IN THE CIRCUIT COURT OF DAVIDSON COUNTY
AT NASHVILLE, TENNESSEE 2: 56

Amended Lawsuit –
Filed July 3, 2014

AUSTIN DAVIS,

RICHARD R. ROCKER, CLERK

Plaintiff,
vs.



Case No. REDACTED
JURY DEMANDED

COVENANT PRESBYTERIAN
CHURCH OF NASHVILLE; NASHVILLE
PRESBYTERY, P.C.A.; PRESBYTERIAN CHURCH IN
AMERICA (A CORPORATION); STEWART JAMES
(JIM) BACHMANN, JR,

New Trump Federal Judge Chip
Campbell represented the Nashville
Presbytery in 2 child sex abuse
cover-up lawsuits.

Defendants,

AMENDED COMPLAINT

Plaintiff, Austin Davis complaining of Defendants, brings this cause of action for the recovery of damages based on the Defendants' violations of common law negligence, intentional infliction of emotional distress, negligent infliction of emotional distress, false light invasion of privacy, and defamation; whereby, Plaintiff shows as follows:

1. Plaintiff, Austin Davis is an adult citizen and resident of Davidson County, Tennessee.
2. Defendant, COVENANT Presbyterian Church of Nashville (hereafter "COVENANT") is a non-profit corporation organized and existing under the laws of the State of Tennessee and maintains a principal place of business in Davidson County, Tennessee at 33 Burton Hills Boulevard in the Green Hills Community. Its membership, consisting of approximately 2000 members, annually donates approximately \$5,000,000.00 USD a year, tax-free, for the operating budget.
3. Defendant, NASHVILLE PRESBYTERY, PRESBYTERIAN CHURCH IN AMERICA (P.C.A) (hereafter "NASHVILLE PRESBYTERY") is an unincorporated organized body of churches existing under the laws of the State of Tennessee; same possessing actual and/or

apparent authority over Defendant, COVENANT, as a parent organization of Defendant, COVENANT; same maintaining a principal place of business in Davidson County, Tennessee; same at all times alleged in this complaint being liable for acts committed by Defendant, COVENANT, its agents and its employees as to include the Defendant, BACHMANN.

4. Defendants PRESBYTERIAN CHURCH IN AMERICA (A CORPORATION) (hereafter "P.C.A.") is a non-profit corporation organized and existing under the laws of the State of Georgia; same maintaining a principal place of business in the State of Georgia; same being a parent corporation of Defendant, COVENANT and Defendant, NASHVILLE PRESBYTERY, and same possessing actual and/or apparent authority of Defendants, COVENANT and Defendant, NASHVILLE PRESBYTERY; same at all times alleged in this complaint being liable for acts committed by Defendants, NASHVILLE PRESBYTERY, COVENANT, their agents and their employees as to include the Defendant, BACHMANN. Its annual tax-free donations exceed \$700,000,000.00 USD a year.

5. Defendant, STEWART JAMES (JIM) BACHMANN, Jr. (hereafter "BACHMANN") is an adult citizen and resident of Davidson County, Tennessee. BACHMANN is the registered agent of Defendant, COVENANT. BACHMANN is the senior pastor at Defendant, COVENANT. At all times relevant and material hereto, BACHMANN is being sued in his individual capacity and in his capacity as an agent, employee, officer, and member of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A. acting within the scope of his role as an agent, employee, and officer of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A. at all times mentioned in this complaint, and with the full knowledge, consent, and approval of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A..

6. At all times mentioned in this complaint, Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A. are liable for the intentional and negligent acts or omissions of Defendant, BACHMANN under the theory of respondeat superior.

7. At all times mentioned in this complaint, Plaintiff Austin Davis, is a private citizen, and a public invitee of the Defendant, COVENANT.

JURISDICTION AND VENUE

8. Jurisdiction and venue are proper in Davidson County, Tennessee because Plaintiff resides here, Defendants' acts and omissions occurred here, and Defendants either reside here, conduct substantial business here, or have substantial and significant connections here.

BACKGROUND

9. Prior to the Defendant, BACHMANN, writing a serious damaging letter on June 24, 2013 (which has a statute of limitations for one year), the Defendant, BACHMANN, as early as on or before July 2, 2008, initiated and waged a diverse and damaging propaganda campaign against Plaintiff, Austin Davis, which continues to this day. Said diverse and damaging propaganda campaign was and is designed by Defendant, BACHMANN, to smear, defame, damage, demonize, slander, humiliate, discredit, and to falsely criminalize the Plaintiff, Austin Davis, before the public-- including Tennessee Judges and Metro Police sworn to uphold the secular law. Said diverse and damaging propaganda campaign waged by Defendant, BACHMANN, has over the years, utilized, amongst other tools: (1) armed Metro Police against Plaintiff, Austin Davis, (2) armed security against Plaintiff, Austin Davis, (3) made use of bullet-proof vests worn by pastors as props to support Defendant, BACHMANN's false claim to others that the Plaintiff was a potential threat to come in and shoot up the Church and Congregation, and (4) made use of the bully pulpit aided by internal and external verbal and written propaganda to create Defendant,

Still on-going
in 2020

COVENANT's long-term public enemy # 1 to be Plaintiff, Austin Davis. This public enemy # 1 campaign has been used and continues by Defendant, BACHMANN, in a sustained effort to: (1) promulgate internal and outside fear in others of Plaintiff, Austin Davis, (2) promulgate dysfunctional and damaging labeling of Plaintiff, Austin Davis, and (3) promulgate the never-ending damaging and humiliating community atmosphere for Plaintiff, Austin Davis, his family, and his remaining friends.

10. Prior to the Defendant, BACHMANN, writing a serious damaging letter on June 24, 2013 (which has a statute of limitations for one year), the Defendant, BACHMANN, in waging said diverse and damaging propaganda campaign against Plaintiff, Austin Davis, at what appears to be all costs, continues to demonstrate his willingness to make false statements even if it would otherwise mean jail time for anyone else. For example, in 2008, Defendant, BACHMANN, makes a false "harassment" report to Metro Police Officer C. A. Rich (Incident Report # 08-444421) falsely stating that Plaintiff, Austin Davis (the alleged criminal suspect as asserted by Defendant, BACHMANN) had resigned as a member of Defendant, COVENANT, a week earlier when in fact Plaintiff, Austin Davis had resigned from Defendant, COVENANT, almost two years earlier on July 27, 2006 with said resignation being accepted by Defendant, COVENANT, and yet Plaintiff, Austin Davis, and his family, continued to attend Defendant, COVENANT, as a "public invitee" along with many other "public invitees" within the Nashville Community until Metro Police banned Austin Davis from returning to the property after a lawful visit was made to the property on June 29, 2008. Still yet, Defendant, BACHMANN, makes even a 2nd false "harassment" report to Metro Police Sgt. Twana Chick (Supplemental Report to #08-444421) concerning false assertions of Plaintiff, Austin Davis' mental stability, which resulted in Sgt.

**Has Article I
Section 3 of TN
Constitution
been repealed
by Nashville
Police.**

Chick writing in her report: "I explained the mental health option if an arrest does become necessary."

11. Upon information and belief, the false reports between Defendant, BACHMANN, and Metro Police Officer C. A Rich, and Sgt. Twana Chick, resulted in at least two written false reports by Metro Police to effectually label, criminalize, and damage Plaintiff, Austin Davis' reputation with official public records permanently stored within the Metro Police system readily available for internal police access and for possible public access and viewing. Upon information and belief, Defendant, BACHMANN, often circulates these embellished false reports to members of Defendant, COVENANT, to justify his continued damaging propaganda campaign of Plaintiff, Austin Davis to members of Defendant, COVENANT, who regularly donate monies to support Defendant, BACHMANN's efforts with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A..

12. On July 2, 2008, as a supportive witness for Defendant, BACHMANN, attorney Worrick Robinson also made a false statement to Metro Police Sgt. Twana Chick, which is recorded in her report: "I spoke with Worrick Robinson who witnessed the trespass [of Austin Davis]." (The truth being that Austin Davis did not commit legal trespass, has never been served a legal notice of trespass by the secular property owners of the COVENANT property, has never been arrested and charged with trespass, has never been before a Tennessee Judge for the crime of trespass, and in reality, did possess the full civil rights to return to the COVENANT Property as an invited guest to a COVENANT Member wedding, on July 14, 2012, four years after Metro Police imposed the unlawful ban upon the freedom of movement, worship and speech by Austin Davis. In addition, Austin Davis also returned to the COVENANT Property again a few months later on October 21, 2012 as Metro Police report # 2012-0862403 clearly documents and records. At that

time, COVENANT Leadership pursued no arrest of Austin Davis for returning the second time to the COVENANT Property and the Plaintiff, Austin Davis, continues stand firm with Metro Police and the DA's office that he is operating within his Constitutional rights as an American citizen to legally go to the COVENANT property as a "public invitee" like any other "public invitee" even though this unusual secular trespass issue has never been adjudicated in a court of criminal or civil law. On information and belief, Defendant, BACHMANN, often circulates these false reports to members of Defendant, COVENANT, to justify his continued damaging propaganda campaign of Plaintiff, Austin Davis to members of Defendant, COVENANT, who regularly donate monies to support Defendant, BACHMANN's efforts with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A..

13. On July 14, 2008, at the invitation of Defendant, BACHMANN, Metro Police Sergeant Twana Chick participated in a COVENANT Joint Board Meeting to prop up Defendant, BACHMANN's, planned "security" briefing of Plaintiff, Austin Davis on COVENANT property before a large gathering of approximately 50 church leaders whereby a fact summary sheet was discussed for disseminating untrue information to the roughly 2000 COVENANT members who might have questions about the use of a new and secret security unit to prevent a "public invitee" from attending a "public worship" service in Sunday Church. Per COVENANT Board Minutes, COVENANT Leaders voted to continue the new security detail procured to target COVENANT public enemy #1, Austin Davis, and the board minutes also indicated that COVENANT Elder Herb Kneeland was assigned to be chairman of a special committee responsible for working to develop a new comprehensive, long-term security plan with the deacons for the protection of COVENANT Presbyterian Church. On information and belief, during this same July 14, 2008 board meeting and with the full knowledge of Defendant, BACHMANN, a confessed

Covenant-Police human authorities violated Article 1 Section 3 of TN Constitution.

2017 - A rigged grand jury with Covenant Security guard Solomon Holley finally indicted Austin Davis on a false trespass charge.

child-molester was allowed to quietly resign from a church leadership position while a secular Metro Police Officer was an invited guest to the same board meeting. Also, during this same July 14, 2008 board meeting, Defendant, BACHMANN, failed to inform Sgt. Twana Chick that COVENANT Deacon and Founder, John Perry, had recently confessed to the heinous molestation of a young R even though John Perry was still subject to arrest by nine days under the Tennessee Statute of Limitations. In addition, Sgt. Chick was also not informed that Plaintiff, Austin Davis had been asking questions during a sustained period of time from 2002-2008 about the safety and welfare of other children who had been placed in the confessed molester's "safe house" with the knowledge and approval of Defendant, BACHMANN. Although Defendant, BACHMANN, was completely aware of the child-molestation confession which took place in the **spring of 2008**, Plaintiff, Austin Davis was unaware that John Perry had made a confession to molesting at least one child (and possibly others) and Plaintiff, Austin Davis, was also unaware that John Perry had been to a sex-addiction treatment in Arizona a few months earlier. With the blessing of Defendant, BACHMANN, John Perry walks around a free man to this day. **2020 - Still protected by Nashville Police.**

Police lied about SOL being 19. The SOL was at least 21, or older.

Per Ms. Cone's sworn testimony, Covenant Pastor Larry Ferris contacted Ms. Cone about John Perry's child sex abuse in April 2008.

14. On information and belief, Defendant, BACHMANN, also proactively participates in numerous COVENANT meetings (which includes members of a **lawsuit committee** formed at the directive of Defendant, BACHMANN) to discuss the problem of Austin Davis or to discuss Plaintiff, Austin Davis as a potential security threat with information from those discussions being disseminated to others within the Nashville Community. On information and belief, to further propagate the false notion making Plaintiff, Austin Davis the #1 public enemy of COVENANT, while at the same time even spreading the false information to the wider community within Nashville, COVENANT leaders now convey communications that Plaintiff, Austin Davis is hateful, angry, nuts, crazy, threatening, mentally ill, or a possible "church shooter" security threat,

Feb 2013 - Nashville Police lied to Covenant Members: "There is nothing to these claims."

2017 DA Prosecution Witness Federal Judge John Bryant was a member of this 2014 lawsuit committee.

without any basis in reality or fact, and all with the intent to damage the Plaintiff, Austin Davis with the full knowledge and consent of defendants, BACHMANN, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A..

15. This false and damaging information developed by Defendant, BACHMANN, is then disseminated down to lower level COVENANT members who also spread the false information to other COVENANT members and to secular outsiders in similar fashion to the way that the Gulf of Mexico was polluted by the BP oil spill, only in this circumstance the wider Nashville community is polluted by the false and damaging information flowing from Defendant, BACHMANN and COVENANT Leaders. This false and damaging information concerning Plaintiff, Austin Davis, flows from leadership fact summary sheets, congregational meetings, individual meetings, phone calls, emails, personal conversations by word-of-mouth, and the official COVENANT information desk where Metro Police have been cited as a stamp of tax-payer approval on the conduct of the six-year damaging smear campaign being waged by Defendant, BACHMANN with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A..

Listen to audio of Elizabeth Parks: "There is nothing to these claims."

16. Here is some specific information on the six-year damaging smear campaign being waged by Defendant, BACHMANN with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A.:

- a. On or about July 6, 2008, an armed security unit followed and humiliated the 13-year old daughter of Plaintiff, Austin Davis with the approval of Defendant, BACHMANN. The humiliation of the 13-year old minor was done in full view of other children and Harpeth Hall classmates of the daughter who ostracized, bullied and harassed the daughter even more once the Plaintiff, Austin Davis, was deemed to be a potential

How many off-duty police officers were on the secret armed assault unit? How many on-duty police officers were present on July 6, 2008 when a 13-year old girl was harassed and targeted? A molested girl victim has never been asked because MNPD apparently intimidates female employees, and little girls.

threat by Metro Police and COVENANT Leaders and a possible “crazy” shooter by others within the Nashville community..

b. On or about July 20, 2008, a friend and former COVENANT Member called the Davis home to find out if it was true if Austin Davis had gone up or planned to go up to COVENANT to shoot several pastors. At the time of this bizarre phone call, the Plaintiff, Austin Davis, did not even realize that a “security” briefing had been conducted six days earlier before a Joint Board Meeting to discuss the Plaintiff as a “security” threat and that a summary fact sheet was already being prepared for dissemination for members of the COVENANT Corporation and anyone who might ask a question about a new secret security detail being used to prohibit a “public invitee” from attending a “public worship” service on a Sunday morning in Nashville.

c. On or about October 30, 2008, Dr. Jim Fleming, father-in-law to the Plaintiff, Austin Davis, informed his ex-wife, Nancy Fleming, that COVENANT Elder Charlie Fentriss had requested for Dr. Fleming to give Defendant, BACHMANN, a phone call. Dr. Fleming informed Nancy Fleming that the Defendant, BACHMANN, had told him several concerns about Plaintiff, Austin Davis: 1) That Defendant, BACHMANN, had worn a bullet-proof vest under his black robe to protect him from Plaintiff, Austin Davis; 2) That Defendant, BACHMANN, was concerned about the safety and welfare of Dr. Fleming’s daughter and his grandchildren; 3) That Defendant, BACHMANN, had reported Plaintiff, Austin Davis to Metro Police because he feared that Plaintiff, Austin Davis was mentally unstable and was coming to the church property to do bodily harm to Defendant, BACHMANN, possibly even bringing a gun with him to shoot the Defendant, BACHMANN.

Austin Davis does not own a gun and is no threat to anyone. Have Police done a mental assessment of Jim Bachmann?

Jim Bachmann and others had poisoned Dr. Fleming against Austin Davis for years. Dr. Fleming cut off and disinherited his daughter and two grandchildren a few weeks before police threatened the Davis family on July 2, 2008.

- d. On or about November 1, 2008, after learning about the unsettling report from Dr. Jim Fleming, the Plaintiff's father-in-law, the Plaintiff, for the first time, began to make numerous attempts to obtain Metro Police reports from downtown public records. To the Plaintiff's surprise, no police reports or any other information were available and it took several months and approximately five trips to downtown records to finally unearth anything on the evening police visit to the Plaintiff's private residence on July 2, 2008. On or about December 2008, the Plaintiff, Austin Davis, finally obtained a MNPD Call History report from a uniform police officer but the report showed that the police visit to the Davis private residence was logged as being requested by a citizen needing police assistance. Per the Plaintiff, no one in the Davis family called the police to come to their private home to investigate anything, especially not the safety of the Plaintiff's wife and children nor to make an assessment of the mental health of the Plaintiff. In addition, the Office of Professional Accountability was unable to provide a satisfactory answer on how two Metro Detectives were called and dispatched to the Plaintiff's private residence when an OPA investigation was concluded with a face-to-face meeting on February 24, 2009.
- e. On or about April 4, 2009, Plaintiff, Austin Davis, made a request for an investigation to District Attorney Torry Johnson and on June 15, 2009, DA Torry Johnson responded with a letter stating: "These complaints are beyond the jurisdiction of this office."
- f. On information and belief, on or about July 9, 2009, the Plaintiff, Austin Davis, received the police supplemental report from OPA Director Kennetha Sawyer which was completed by Sgt. Twana Chick from the night of July 2, 2008.

g. On or about August 11, 2009, Plaintiff, Austin Davis, made a request for an investigation to Chief of Police, Ronal Serpas and on August 20, 2009, Mr. James Charles of the Metro Law Department responded with a letter stating: "Until a crime has been committed, by whichever party, or a Metropolitan ordinance violated, these disputes are not within our purview."

h. On information and belief, on or about June 6, 2010, confessed child-molester, John Perry, was publicly excommunicated by COVENANT Presbyterian Church with the following statement: "Whereas John Perry has confessed to committing heinous and repetitive sin against **Redacted** and has not shown evidence of repentance, the Session of COVENANT Presbyterian Church has declared that he is excluded from the sacraments and cut off from the fellowship of the church. The Session has taken this action with sorrow and the desire to see him repent and return to Christ and the fellowship of His church. If you have questions, feel free to ask the pastors or other Session members." This ecclesiastical court judgment follows a sworn statement by the wife of John Perry in a divorce complaint which states that the couple separated on April 26, 2008 and also states: "Wife fears for her safety and the safety of **REDACTED** unless Husband is restrained from molesting, harassing, assaulting, threatening, or harming her and/ **REDACTED**

A Covenant-Police Mann Act Federal crime cover-up was already a year in progress.

Judge Carol Soloman did not recuse and she demolished 3 related cover-up lawsuits filed by members of the Davis Family.

Austin Davis was reluctant to report John Perry to Nashville Police because he feared more Covenant-Police retaliation. Police-Covenant forces did retaliate as a Mann Act Federal crime cover-up still continues before the TN Court of Criminal Appeals.

due to Husband's past acts of abuse and molestation of **REDACTED**. The child-molestation abuse was identified by Susan Ann Perry, wife of John Perry, in a sworn complaint represented by Worrick Robinson, filed before Judge Carol Solomon, on March 13, 2009.

On information and belief, on or about October 1, 2012, Plaintiff, Austin Davis, attended a Police Community meeting at the new Forrest Hills City Office and the

Plaintiff having recently learned and confirmed from multiple sources that the child-molestation was a true report, reported the child-molestation to Sgt. Twana Chick who had placed him under perpetual "threat of arrest" on July 2, 2008, and also reported the child-molestation to Commander Marlene Pardue of the West Nashville Precinct.

On or about November 9, 2012, Catherine Davis, wife of Plaintiff Austin Davis, made a report to Metro Police that a suspected "death threat" was received from a person who signed their name "J" and the Metro Police incident number was 2012-0906123.

Who threatened Austin Davis a month after John Perry was reported to Nashville Police? A person who signed "J."

Police did nothing. Another multi-page creepy letter is in plastic bag and has not been turned over to police.

On or about December 5, 2012, Commander Marlene Pardue, Detective Michael Shreeve, and six other Metro Police authorities met with Plaintiff, Austin Davis, and his wife, Catherine Davis, whereby Detective Shreeve informed the Plaintiff and his wife that the child-molestation statute of limitations had expired and nothing could be done. The Plaintiff, Austin Davis, explained that the defendant, BACHMANN, had made a false report to Metro Police 9 days prior to the victim's 19th birthday but Metro Police authorities did not investigate the circumstances surrounding the use of the "harassment" law by Defendant, BACHMANN, to silence and intimidate the Plaintiff, Austin Davis. Also during the meeting, Commander Marlene Pardue assured Plaintiff, Austin Davis, that the Metro Police department had a "neutral" posture towards the dispute between COVENANT Presbyterian Church and the Plaintiff, Austin Davis. The Plaintiff, Austin Davis, was very disappointed and felt the Metro Police position was not "neutral" since the invisible force of the trespass/harassment suppression of full civil rights remained in effect.

Police lied about SOL being 19. The SOL was at least 21, or older.

Commander Pardue lied to the Davis Family to protect child-molester John Perry and a Mann Act Federal crime cover-up. Commander Pardue is also cited in Greta McClain's "Silent No Longer" 60-page press release.

- k. On or about December 17, 2012, Plaintiff, Austin Davis, provided a 108-page document to Metro Police and the DA's office but no one ever responded to the information provided within the document.
17. During the subsequent months after December 17, 2012 and prior to Defendant, BACHMANN, writing a very serious damaging letter on Jun 24, 2013, the Plaintiff, Austin Davis, received messages from voting members of the COVENANT Corporation which demonstrated the success of the Defendant, BACHMANN's diverse and damaging propaganda campaign directed at the Plaintiff, Austin Davis, with the "neutral" position taken by the Metro Police Department.

In 2013, Nashville Police gave Covenant Members a "greenlight" to intimidate and threaten the Davis family,

18. Here are a few samples of emails and sentiments received: **including minor children.**

- a. On information and belief, on or about January 28, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Rebecca Talbert's account which stated: "It's harassment and you need serious help. I pray you will get some."
- b. On information and belief, on or about February 17, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Paul Carpenter's account which stated: "You're nuts!" A few minutes later, a second email was received from the same account, which stated: "Please do email me again you're your malicious, slanderous information."
- c. On information and belief, on or about Feb 17, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACH-

**The Covenant
Congregation
meeting was in
Feb 2013.**

All of these Covenant Members are actively participating in a Mann Act Federal crime cover-up after Nashville Police told Covenant Members in 2013: "There is nothing to these claims."

MANN, an email was received from COVENANT Corporation Member Theresa Joy Powers account, which stated: "I am aware of your lies. If you contact me again I'll consider it harassment against me and I WILL CALL THE POLICE. I will also consider suing you for the harassment, You are mentally ill. GET HELP!"

Sound like Ms. Powers got the message from Nashville Police.

- d. On information and belief, on or about Feb 17, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member M G Lovelady's account which stated: "Do not send me anymore of your lies and threats. You need to seek help for your mental health."
- e. On information and belief, on or about Feb 20, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was forwarded to the plaintiff from a COVENANT Member who received an email from a COVENANT staff member: "So sorry to hear that you received an unwanted email about our church. The sender is a former disgruntled member, Austin Davis, who (we think) is suffering from a mental illness. A great many of our church members have received these emails. Generally, in the past, when asked to remove a name from his email list he has honored the request. If you'd like further info I'm sure Jim [BACHMANN] would be glad to answer any questions."
- f. On information and belief, on or about March 3, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Brian Clay Johnson's account which stated: "I've heard about you and your actions from very reliable sources. The Session acted in the exact manner it should have in excommuni-

Nashville
Police

cating you. Frankly, you appear crazier and crazier every email you send. You need to get over it. And by the way, do not send any more of you hateful emails to my email address.”

g. On information and belief, on or about March 10, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Charles Cline’s account, which stated: “I have had enough of your harassment. Take me off your e-mail list. Try to find something meaningful that will benefit others rather than feed your obsession... Charles Cline”

h. On information and belief, on or about March 10, 2013, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Neil Coates’ account which stated: “Stop sending me emails. I did not give you my email address, so what makes you think you have permission to steal my email address and start sending me your garbage. I’m telling you to stop.”

19. Finally, Plaintiff, Austin Davis, obtained legal counsel and filed a lawsuit on June 19, 2013 asserting truthful and factual statements against Defendant, BACHMANN, and others to finally stop the Defendants continued damaging and discrediting of Plaintiff, Austin Davis, his family, and to rehabilitate and restore the Plaintiff and his family.

Worrick Robinson’s long-time friend,
Judge Carol Soloman, demolished the
1st Lawsuit, and two more.

COUNT I

20. Plaintiff repeats paragraphs 1 through 19 of this complaint.

21. That the Defendant, COVENANT, through its agent and employee, Defendant, BACHMANN, widely publishes an email newsletter in the City of Nashville, State of Tennessee,

Covenant-Police deceit
and lies turned Charles
Cline against Austin Davis
even though Austin Davis
coached the son of Charles
Cline at Ensworth.

and elsewhere in the United States known as COVENANT Presbyterian News, Notes, or Prayer Concerns.

22. That COVENANT Presbyterian News, Notes, or Prayer Concerns is a weekly email newsletter and has a large and flourishing circulation of approximately 2000 recipients, particularly in and about the City of Nashville, State of Tennessee, and elsewhere in the United States.

23. That in response to the lawsuit filed June 19, 2013, on June 24, 2013, the Defendant, BACHMANN, composed and published in the aforesaid email newsletter, an article of which the following is a true and correct copy:

"Dear Brothers and Sisters,"

"I write to inform you that a former member, Mr. Austin Davis, has filed a lawsuit against our church, seeking damages and making a number of serious, but false allegations. You may read something in the papers tomorrow or soon thereafter about this. He has also sued the Nashville Presbytery, and the Presbyterian Church in America denomination."

"Mr. Davis has made numerous complaints about our church for the last 10 or 11 years. Our best efforts to resolve these matters proved unsuccessful. We are saddened that he has taken this step but will cooperate fully with authorities in the coming days. We will also keep you well informed as developments arise. Please keep the leadership of the church in your prayers, in particular the committee that will be handling this: Herb Kneeland, chairman; John Avery, John Bryant, and Ron Kimery. Please contact any of these men, or any of the pastors if you have questions. Thank you for your prayers!"

"Warmly, in Christ,"

"Pastor Jim"

24. That this article appeared under the subject headline "A Letter from Pastor Jim"

25. That the matter contained in the false propoganda was published of and concerning the Plaintiff, Austin Davis, and lawful action taken by Plaintiff, Austin Davis and others in a court of

Covenant Church Leaders knew about John Perry's child sex abuse in April 2008; or possibly as early as 2007; or possibly as far back as 2002 when Greg Lurie's children were put in John Perry's "safe house."

The DA Prosecution last-second replacement witness for Herb Kneeland was Federal Judge John Bryant.

law to finally stop the Defendants continued damaging and discrediting of Plaintiff, Austin Davis, his family, and to rehabilitate and restore the Plaintiff and his family.

26. That by the article the Defendant, BACHMANN, meant, intended to mean, and was understood by the reading public as meaning that only the Plaintiff, Austin Davis, had filed a lawsuit, and that everything stated in the lawsuit was a lie despite the seriousness of the allegations, and that the Plaintiff, Austin Davis, has been filing multiple lawsuits for 10 or 11 years which are predicated on lies; therefore, the reading public should discredit Plaintiff, Austin Davis, and view Plaintiff, Austin Davis, as a liar, and nothing more. Furthermore, that by the article the Defendant, BACHMANN, meant, intended to mean, and was understood by the reading public as meaning that the Plaintiff, Austin Davis, is fundamentally dishonest, that the Plaintiff, Austin Davis, has been dishonest for at least 10 or 11 years, and that anything that the reading public may have heard from Austin Davis in the past 10 or 11 years is a lie.

27. That thereby the Defendant, BACHMANN, imputed to the Plaintiff, Austin Davis, the crime of perjury, deceit, harassment, and maliciousness in violation of the laws of the State of Tennessee. Furthermore, Defendant, BACHMANN, imputed to the Plaintiff, Austin Davis, that he is fundamentally dishonest, that the Plaintiff, Austin Davis, has been dishonest for at least 10 or 11 years, and that anything that any third party may have heard from Austin Davis in the past 10 or 11 years is a lie, and nothing more.

28. That the false propaganda published by the Defendant, BACHMANN, with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A. was false and damaging to Plaintiff, Austin Davis. The severe impact of the false and damaging statements to a wide mass of people has caused a lasting damaging ripple effect to the Plaintiff, Austin Davis, which is unrecoverable. That Defendant, BACHMANN, published

those damaging statements with malice, intent, and with reckless disregard as to the falsity of the statements. Simply put, the publication of the false and damaging propaganda by the Defendant, BACHMANN, concerning Plaintiff, Austin Davis was made to an even wider and unmanageable audience to further discredit and injure the Plaintiff, Austin Davis.

29. That the publication was not a fair and true report of the Plaintiff, Austin Davis's, character or persona, nor was the publication a fair and true report of the judicial proceedings referenced by the Defendant, BACHMANN, nor was the publication a fair rendition of communications between Plaintiff, Austin Davis, and Defendants over the past 10 or 11 years.

30. That in truth, the lawsuit included parties, which Defendant, BACHMANN refused to reveal to COVENANT Members in his regular partial briefing on information to interested parties to fit his agenda in further alienating and further damaging Plaintiff, Austin Davis.

**A reference to 1 of 4
related child sex abuse
cover-up lawsuits.**

That in truth, the Court (in an election year), before which the action was brought by Plaintiff, Austin Davis and others, would not hear the truth of the allegations presented, nor would the Court allow presentation of proof to support the allegations. Contrary to Defendant, BACHMANN'S written propaganda that the allegations in the lawsuit brought by Plaintiff, Austin Davis, were serious, but false, the Court (in an election year) ultimately dismissed the claims with prejudice finding that not one allegation of fact was written in the complaint; therefore, the complaint failed to state a claim for which relief could be granted. At the filing of this Amended Complaint, the matter is on appeal to the Court of Appeals of the State of Tennessee.

32. That in truth, the Court (in an election year), in tandem with Defendant, BACHMANN, and others vigorously resisted their opportunity to present their proof that the allegations in the lawsuit (with issues involving the cover-up of unlawful child sex abuse by the Defendants) brought by Plaintiff, Austin Davis and others were serious, but false. In maintaining the spirit of

Worrick Robinson's long-time friend, Judge Carol Solomon, did not disclose the conflict of interest and refused to recuse denying the Davis Family 3 fair trials.

Judge Carol Solomon demolished 3 of the lawsuits even though she handled the John Perry divorce case and was well-informed about John Perry's child sex abuse from 2009-2012.

Defendant, BACHMANN's diverse and damaging propaganda campaign against the Plaintiff, Austin Davis, the Tennessee Court system with the full knowledge of the false "trespass" allegations made by Defendant, BACHMANN, which were enforced at the word of Defendant, BACHMANN by Metro Police against Plaintiff, Austin Davis, were consistently used in attorney arguments, written and oral, to criminalize the Plaintiff to destroy his legal standing in the Court system as a U.S. Citizen. Repeatedly in a September 19, 2013 hearing before Judge Carol Solomon, the Judge continued to repeat that the Plaintiffs had "no standing" to bring a lawsuit to her court. Following the subsequent election, the incumbent Judge was soundly defeated by public election.

33. That in truth, the damaging statements widely published to approximately 2000 people by Defendant, BACHMANN, concerning the Plaintiff, Austin Davis, and with the knowledge, consent, and approval of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A., were made to manipulate the impact on opinions of a multitude of others on breaking news of the lawsuit, and to further discredit and damage Plaintiff, Austin Davis to a wider and unmanageable audience of peers. As a result, the Plaintiff, Austin Davis, was then placed in a position to make efforts impossible to rehabilitate his already damaged reputation at the directive of Defendant, BACHMANN.

34. Subsequent to the Defendant, BACHMANN, publishing of the false and damaging letter on Jun 24, 2013, the Plaintiff, Austin Davis, continued to receive messages from voting members of the COVENANT Corporation, which echoed the diverse, defamatory, and damaging propaganda campaign directed at the Plaintiff, Austin Davis.

a. In concert with the Defendant, BACHMANN's diverse and damaging propaganda campaign, on or about January 5, 2014, assistant pastor, J Hager, with full knowledge that a

Pastor J Hager is also connected to Tates Creek Presbyterian Church in Lexington, KY, where Pastor Brad Waller also committed sexual abuse.

young R had been molested multiple times by Founder and Deacon John Perry, preached a sermon to COVENANT Members and public invitees whereby he stated: ““Jesus didn’t just come to remove the guilt of sin. Although he did that, and we praise God for it, he didn’t come just to remove the guilt of sin. He gave his life and rose from the grave so that you could fight. He hasn’t just rescued His people to ride out this life doing whatever we want to do, knowing we are going to end up in a good place. Instead, He has rescued you to do something. He set you free to fight, to battle, to mortify, to kill, to wage war, to step into the ring, to walk and run and live. You may have noticed my peculiar title here, he has secured you, Christian, a license to kill, It’s a 007, it’s... we are given a mission to go, and to kill that which seeks to threaten us. A license according to Webster’s is defined as an exceptional freedom allowed in a special situation, permission to do something given by an authority.”

Former Covenant Youth Leader Betsie Carlson was the adult who invited the 13-year old daughter of Austin Davis to Covenant on July 6, 2008. Betsie’s husband, Justin Carlson, was on staff at Tates Creek Presbyterian and is a good friend with Pastor J Hager and Pastor Robert Cunningham.

On information and belief, on or about March 2, 2014, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Greg Greenwell’s account, which stated: “Please unsubscribe me from this garbage. You are sending unsolicited email which is therefore SPAM and against international CAN-SPAM laws.”

- c. On information and belief, on or about April 20, 2014, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member Will Gordon’s account which stated: “Please remove me from this and any associated email listing that may be supporting your crusade which as far as I can discern is bearing false witness against thy neighbor. I have complete faith in our law enforcement agencies and court system. If

Nashville Police and Covenant Youth Pastor J Hager gave the Nashville Community a “license” to bully, intimidate, harass and threaten a 13-year old girl with impunity forever.

there is sufficient evidence to support your claims, I believe they will ferret out those who should be accountable. Furthermore, I have faith in our Lord and Savior and His Father to see into the hearts and lead ALL parties concerned to the truth and to act as Christians and confess their sins. Again, please remove me from any and all future mailings from you or those acting in your behalf. Thank you, WGB”

- d. On information and belief, on or about April 29, 2014, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from COVENANT Corporation Member and former **Stated Clerk of the NASHVILLE PRESBYTERY Jack Watkins**’ account, which stated: “I don’t want my silence to be construed as approval for your unending diatribe. So please add my name to the list of those requesting removal from your list.”
- e. On information and belief, on or about April 29, 2014, in response to being informed about a child-molestation cover-up at COVENANT led by Defendant, BACHMANN, an email was received from NASHVILLE PRESBYTERY member Nathan Tutor’s account, which stated: “Please remove me from this list. I have read all your emails and tried to keep an open mind. But, what seemed to me like an issue that I needed to look into for myself has become ridiculous. These emails are so very pregnant with innuendos and sarcasm I would rather not continue getting them. You have lost almost all credibility in my eyes, though I am moved by your perseverance. I am sorry for your pain and loss. I cannot imagine the betrayal and anger. However, I think you may have something wrong mentally, Mr. Davis. I mean that with all compassion and hope you are able to find some relief this side of the eternal healing for all who trust in Christ. With all respect, I ask you

Jack Watkins was crystal clear. He is 100% committed to protect child-molester John Perry and a Mann Act Federal crime cover-up.

as a brother to please don't use this mail as a platform to further your agenda. Best to you.

35. That indeed, contrary to the false and damaging statements of Defendant, BACHMANN, which were widely published by Defendant, BACHMANN, for the reading public of approximately 2000, the Plaintiff, Austin Davis, has always been an imperfect, but honest person.

36. As a direct and proximate cause of the publication of the aforesaid statements, the Plaintiff, Austin Davis, has suffered injury and damages for which the Defendants are liable.

COUNT II

37. Plaintiff repeats paragraphs 1 through 36 of this complaint.

38. That the aforesaid damaging propaganda published in reckless disregard as to the falsity of the publicized matter with the knowledge of and by Defendant, BACHMANN, placed the Plaintiff, Austin Davis (a regular citizen of the community or non-public figure), in a damaging false light as a liar who has been a liar for the past 10 or 11 years to approximately 2000 recipients.

39. The aforesaid damaging and false publication along with being portrayed as liar to a wide audience would be highly offensive to any reasonable person, especially when the statement is being made by the Senior Pastor with the knowledge, consent, and approval of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A., at a church predominantly comprised of numerous wealthy, prominent business and civic leaders in the most prestigious and powerful area of Davidson County, TN.

40. That as a direct and proximate result of the damaging and false publication placing the Plaintiff, Austin Davis in a false light, the Plaintiff has suffered serious and severe injury and damages for which the Defendants are liable.

COUNT III

41. Plaintiff repeats paragraphs 1 through 40 of this complaint.

42. Defendant's false and damaging statements on June 24, 2013 concerning the Plaintiff, Austin Davis, disseminated to approximately 2000 people by the Defendant, BACHMANN, was intentional, reckless, malicious, and published for the purpose of causing Plaintiff, Austin Davis, to suffer unrecoverable humiliation, mental anguish, and emotional and physical distress.

43. Defendant, BACHMANN's, conduct in publishing the false and damaging statements to approximately 2000 people by the Defendant was outrageous and intolerable because it offended generally accepted standards of decency and, morality, and due care as it is beyond the normalcy to have a Senior Pastor (Defendant, BACHMANN) of a mega church publicly defaming one private citizen individual invitee.

44. Defendant COVENANT, NASHVILLE PRESBYTERY, and P.C.A. knew, or should have known, that their failure to exercise due care in properly training, instructing, and restraining their agent and employee, BACHMANN from engaging in publishing false and damaging information about the Plaintiff, Austin Davis, would cause Plaintiff, Austin Davis, severe emotional distress. Their failure to take action under the circumstances constitutes a breach of their duty of care owed to public invitees and citizens in the community.

45. As a direct and proximate result of defendants' COVENANT, NASHVILLE PRESBYTERY, and P.C.A. breach of their duties, Plaintiff, Austin Davis suffered severe emotional distress and mental suffering and was damaged, for which the Defendants are liable.

COUNT IV

46. Plaintiff repeats paragraphs 1 through 45 of this complaint.
47. On or about June 24, 2013, BACHMANN was an employee, agent of the Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A. acting within the scope of his role as an agent, employee, and officer of Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A.
48. Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A., at all times pertinent herein, were negligent in allowing their employee and agent, BACHMANN, to disseminate said false, damaging, and defamatory statements regarding the Plaintiff, Austin Davis, only to continuously aide the Defendants in the ongoing mass cover-up of child sex abuse by the Defendants to protect the financial wealth and status of the Church and the reputations of its wealthy and powerful employees, officers, and members at the expense of and to the damage of others, including the Plaintiff, Austin Davis (deemed disposable by Defendants), which was known or should have been known to all Defendants.
49. In negligently causing or allowing their employee and agent, BACHMANN, in the course and scope of his employment and agency, to widely disseminate said false and damaging propaganda regarding the Plaintiff, Austin Davis, in order to precipitate the ongoing cover-up of child sex abuse by Defendants, when Defendants knew or should have known that said false and damaging propaganda published by BACHMANN was false and damaging, the Defendants, COVENANT, NASHVILLE PRESBYTERY, and P.C.A., breached their duty of reasonable care to Plaintiff by negligently acting or failing to act in at least one or more of the following particulars:
- a. Failing to select and employ a qualified Senior Pastor of COVENANT

capable of conveying truthful material.

- b. Failing to investigate reports of the dissemination of false, damaging, and defamatory libelous propaganda aimed a Plaintiff and his family [with the intent to divert the attention of members, law enforcement, and the public from the Defendants' unlawful cover-up child sex abuse] for the sake of monetary gain and wealth.
- c. Failing to adequately instruct and supervise BACHMANN in the creation, editing, and dissemination of truthful and non-defamatory information about the Plaintiff, Austin Davis, to others.
- d. Failing to investigate the truthfulness of the Complaint widely publicized as serious, but false by Defendant, BACHMANN, when the opposite is true.
- e. Failing to reasonably refrain from promoting and encouraging a hostile, damaging, and public false libelous campaign, under color of church title, to purposefully destroy and attack individual citizens in the community.
- f. Failing to properly discipline their employee and agent for the continuous defaming and damage focused on an individual citizen;
- g. Failing to ensure that their employee and agents complied with all state, federal, and common law.
- h. Failing to adequately train their employee and agent on the level of appropriate in handling matters for which people do not agree as to waging an all-out campaign to destroy individual member of the community in efforts to prove you are right;
- i. Failing to act reasonably under the circumstances.

50. At all times, the Defendants knew or should have known of the unlawful acts or omissions being perpetrated by Defendant, BACHMANN, and that Defendant, BACHMANN was unfit, yet they failed to take action through the exercise of reasonable due care. As a direct and proximate cause of the Defendants' negligent conduct as described, the Plaintiff, Austin Davis has suffered injury and damages for which Defendants are liable. Furthermore, Plaintiff's injuries were caused solely by the negligence of Defendants as herein alleged and without any negligence on Plaintiff's part.

COUNT V

51. Plaintiff repeats paragraphs 1 through 50 of this complaint.

52. As a further direct and proximate cause of Defendants' negligent and/or intentional conduct herein described above, the Plaintiff, Austin Davis, was caused to sustain severe injuries, and other injuries not yet diagnosed; he has in the past and will in the future suffer financial ruin, great pain of mind, sleeplessness, stress, mental anguish, shame, alienation, humiliation, worry, grief, loss of enjoyment of life for life, and the inability to lead a normal life and participate in normal activities within the Nashville Community as he has done for almost 40 years. Furthermore, the Plaintiff, Austin Davis, has suffered loss of income, will continue to suffer a loss of income, and loss of earning capacity. At the time of the injuries, Plaintiff, Austin Davis, was engaged in operations and has as a result of the injuries been unable to perform certain duties in connection with such business and has been required to borrow money from friends and family and file for Chapter 13 bankruptcy in order to support his family, incurring further expenses.

53. As a further direct and proximate cause of Defendants' negligent and/or intentional conduct herein described above, the Plaintiff, Austin Davis, was injured in his good name, fame, and credit, which tended to expose him to public contempt, shunning, ridicule, scorn, aversion,

and disgrace to a wide audience. That negligent and/or intentional conduct tended to produce and continues to produce an evil opinion of him in the minds and communications of those to whom it was communicated. The damaging effect of the negligent and/or intentional conduct of Defendants herein described has caused the Plaintiff, Austin Davis, to be alienated and publicly avoided. The same has emasculated him and from all indications fully and permanently discredited him in name and reputation inside of his community for which he has established a home and family.

54. A very serious and deliberate financial business decision was made by Defendant, BACHMANN, with the full knowledge and consent of Defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A. to defame and seriously damage the Plaintiff, Austin Davis to protect a tax-free donation stream estimated to be over \$5,000,000 a year, and does not include any funds raised for the new Gothic Cathedral estimated to be over \$15,000,000. The defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A. (with their combined annual tax-free donations exceed \$700,000,000.00 USD a year) have fully supported the conduct of the Defendant, BACHMANN, to protect the steady donation stream as other P.C.A. churches are now being financially supported and planted in San Francisco, Boston, Charleston, Murfreesboro, and elsewhere. In essence, the Defendant, BACHMANN, with the full knowledge and consent of defendants, COVENANT, NASHVILLE PRESBYTERY, and the P.C.A. established the value for what it was worth to them to fully support the diverse, defamatory, and damaging propaganda campaign, which began in the secular community with the use of taxpayer funds and Metro Police and continues to this day.

WHEREFORE PLAINTIFF PRAYS AS FOLLOWS:

1. That process issue and be served up the Defendants requiring them to appear and

answer within the timeframe prescribed by law;

2. That upon a final hearing on this cause, the Defendants be found liable for the causes of action herein described above;
3. That the Plaintiff be awarded a judgment for compensatory damages in the amount of no more than \$5,000,000.00 USD;
4. That the Plaintiff be awarded a judgment for punitive damages in the amount of no more than \$30,000,000.00 USD;
5. That the Defendants be taxed with all costs and attorney's fees;
6. For a jury to hear this cause;
7. That the Plaintiff be awarded such other, further, and general relief for which he may

be entitled.

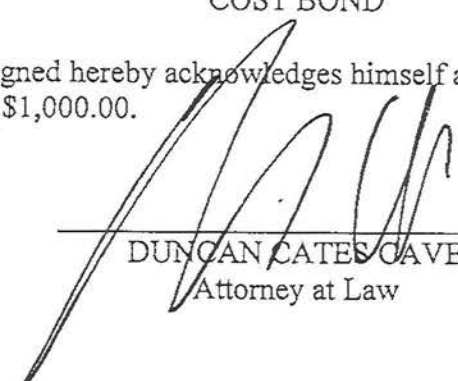
Submitted:



DUNCAN CATES CAVE (BPR# 026235)
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Nashville, Tennessee 37219
PH: 423.620.3417
FX: 423.933.3479
EMAIL: dcavelaw@gmail.com

COST BOND

The undersigned hereby acknowledges himself as a surety for all costs in the foregoing cause not exceeding \$1,000.00.

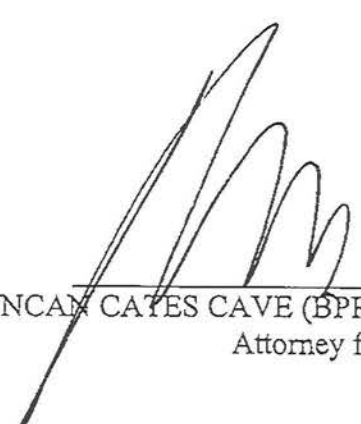


DUNCAN CATES CAVE
Attorney at Law

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of July 2014, a copy of the foregoing was served upon the following parties of interest by regular U.S. mail, postage prepaid, and by email and facsimile where indicated.

Stewart James (Jim) Bachmann, Jr.
33 Burton Hills Boulevard
Nashville, TN 37215



DUNCAN CAYES CAVE (BPR# 026235)
Attorney for Plaintiff

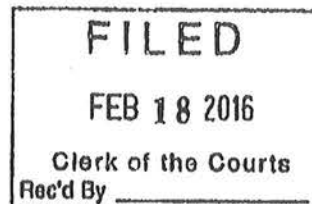
Feb 18, 2016 – The Tennessee Supreme Court ruled against Austin Davis in favor of Pastor Jim Bachmann, and other Defendants, who were aggressively engaged in a Mann Act Federal crime cover-up with no fear of being punished by The Tennessee Supreme Court.

**IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE**

**AUSTIN DAVIS v. COVENANT PRESBYTERIAN CHURCH OF
NASHVILLE ET AL.**

**Circuit Court for Davidson County
No. REDACTED**

No. REDACTED



ORDER

Upon consideration of the application for permission to appeal of Austin Davis and the record before us, the application is denied.

PER CURIAM

All 4 lawsuits were destroyed by lying and fraud before Tennessee Courts during a Mann Act Federal crime cover-up with a new related retaliation criminal case now before the TN Court of Criminal Appeals.

IN THE EIGHTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

FILED
2019 FEB 26 PM 2:31

RICHARD R. ROOKER, CLERK

AUSTIN DAVIS,

Plaintiff,

v.

COVENANT PRESBYTERIAN
CHURCH OF NASHVILLE;
NASHVILLE PRESBYTERY, P.C.A.;
PRESBYTERIAN CHURCH IN
AMERICA (A CORPORATION);
STEWART JAMES (JIM)
BACHMANN, JR.,

Defendants.

Docket No. REDACTED

Why was this order not signed until 3 years later?

ORDER

Pursuant to the Opinion of the Court of Appeals of Tennessee filed February 18, 2016, this Court hereby DISMISSES WITH PREJUDICE Plaintiff's claims for defamation and outrageous conduct against Stewart James Bachmann, Jr. As this resolves all remaining claims, this order shall be deemed a final order. Court costs shall be taxed to the Plaintiff for which execution shall issue, if necessary.

IT IS SO ORDERED.

Entered this 26th day of February, 2019.

Valid? - Signed 1 year and 19 days after the recusal of Judge Kelvin Jones in a related case.



JUDGE KELVIN JONES



UKRAINE

Sen. Lamar Alexander



New Federal Judge William "Chip" Campbell – Attorney For Nashville Presbytery against Austin Davis during a Mann Act Federal Crime cover-up.