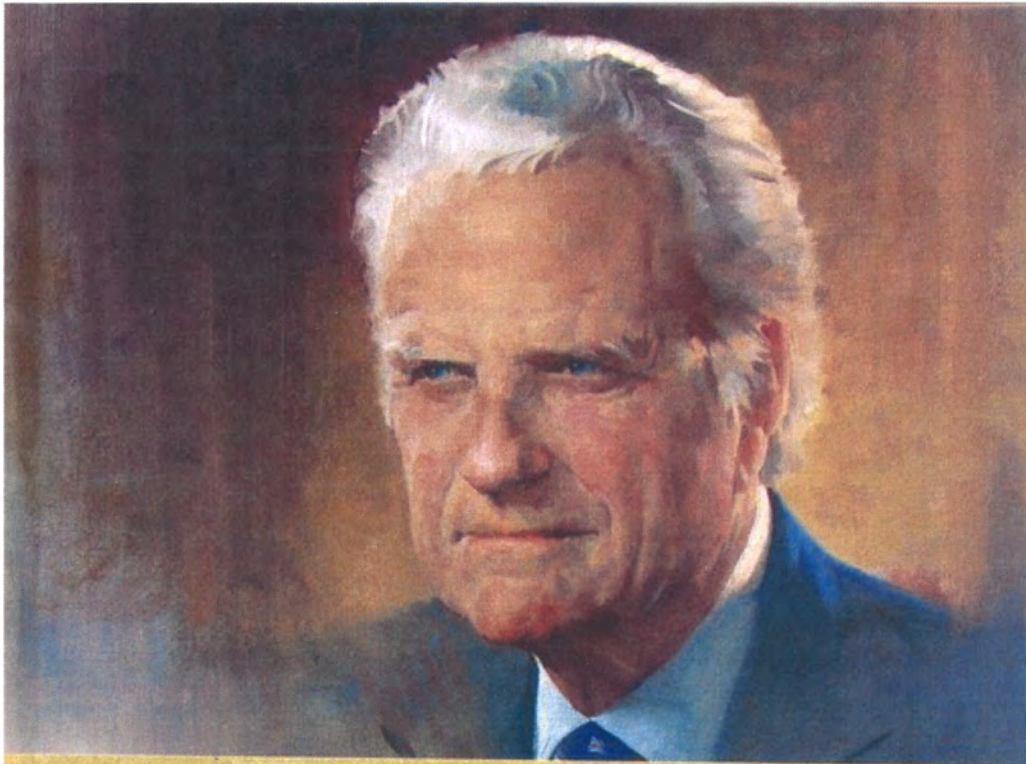


Did child-molester John Perry write Through My Father's Eyes?



Through
MY FATHER'S
EYES



FRANKLIN
GRAHAM

with Donna Lee Toney

IN THE CRIMINAL COURT
FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

STATE OF TENNESSEE,)
Plaintiff,)
vs.) 2017-A-62
WILLIE AUSTIN DAVIS,)
Defendant.)

Judge Dozier's is a long-time friend of Covenant Member Worrick Robinson, and his uncle, Don Dozier, was a Covenant Member and former police officer. Judge Dozier did not disclose, or recuse, until after Austin Davis was in jail.

Transcript of Trial, Volume I
Before the Honorable Steve Dozier
September 11, 2017

Appearances:

For the State:
Chandler Harris ← →
Jenny Charles
Assistant District Attorney Generals
Nashville, Tennessee

Chandler Harris has fled to work for a Philadelphia law firm: Mullen Coughlin. The malicious prosecution case is now before the TN Appellate Court.

For the Defendant:
Willie Austin Davis
Pro Se
Nashville, Tennessee

Shana Crawford did not sign or certify the court transcripts now before the Tn Appellate Court. Austin Davis was not allowed to verify the accuracy of the disputed transcripts via the original video-audio record. Totally rigged and corrupt.

Shana Crawford, CCR
Official Court Reporter
Division I
Nashville, Tennessee

(931) 494-1191 * (615) 862-4200 X 71581

I-N-D-E-X

Opening Statement by General Harris.....	4
Opening Statement by Mr. Davis.....	9

Scott Troxel

Direct Examination by General Harris.....	20
Cross-Examination by Mr. Davis.....	32
Redirect Examination by General Harris.....	77
Recross-Examination by Mr. Davis.....	79

John Bryant

Direct Examination by General Harris.....	83
Cross-Examination by Mr. Davis.....	92

James Smith

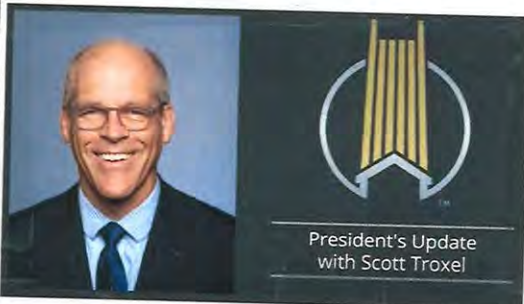
Direct Examination by General Charles.....	120
Cross-Examination by Mr. Davis.....	125
Redirect Examination by General Charles.....	140
Recross-Examination by Mr. Davis.....	149

John Daugherty

Direct Examination by General Charles.....	143
Cross-Examination by Mr. Davis.....	149

Katherine Davis

Direct Examination by Mr. Davis.....	163
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Scott Troxel – Covenant Clerk of Session – 2017 President of Greater Nashville Realtor’s Association - Committed perjury to wrongfully convict Austin Davis at 2017 Trial – Cracked on witness stand to admit that he and Covenant Leaders knew about John Perry’s child sex abuse prior to the July 14, 2008 Covenant Session Meeting which included Nashville Police – Is still protecting a Mann Act Federal crime cover-up and Rev. Franklin Graham’s co-author, John Perry.

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1 Q. And you have been an elder for ten
2 years?

3 A. Uh-huh. Yeah.

4 Q. Were you ever a deacon?

5 A. Yes, I was a deacon.

6 Q. Did you ever run anybody off of the
7 property because you didn't like the way they looked?

8 A. No.

9 Q. You ever asked anybody to leave the
10 property beforehand?

11 A. No.

12 Q. In this particular case, the Session got
13 together after letters written to members of the
14 church telling them that there is a very serious
15 scandal that's gone on in the church for six years,
16 and all of the sudden we've got guards at the doors
17 and trespass letters being sent?

18 A. Yes.

19 Q. That's just normal and --

20 A. No, that's not normal.

Q. What were you guys hiding then?

Judge Dozier banned me
from asking any questions
about child sex abuse or the
cover-up in a pre-trial hearing.

23 GENERAL HARRIS: Objection.

24 THE COURT: Okay. What is your

25 objection?

Judge Dozier was forced to open
the child sex abuse door at this
critical moment because Asst. DA
Chandler Harris had asked Troxel
a question about the past.

1 GENERAL HARRIS: Speculative nature of
2 the question.

3 THE COURT: Okay. I -- he can answer
4 it. Do you know of anything that --

5 **Covenant Elder -** → **THE WITNESS: We were hiding nothing.**
6 **Clerk of Session -**
7 **Scott Troxel**

7 BY MR. DAVIS:

8 Q. You what?

9 A. We were hiding nothing.

10 Q. I mean, I didn't introduce this into
11 evidence, you introduced it into evidence.

12
13 THE COURT: What is your question?

14 MR. DAVIS: I'm just trying to ask
15 questions.

16 THE COURT: Okay. Go ahead.

17 MR. DAVIS: Well, right now I feel very
18 limited because I've been in pre-trial motions and
19 he's just told me that --

20 THE COURT: What questions you wanting
21 to ask?

22 MR. DAVIS: Are -- I want to ask him
23 what happened to the child molester that went to
24 Arizona in April of -- right before all of this
25 happened to me? He went to Arizona for treatment.

1 THE COURT: All right. Why don't you
2 break that down into -- you're making assumptions
3 through the question.

4 Do you know anything about a child
5 abuser?

6 THE WITNESS: I know what he's talking
7 about. But I don't know anything about Arizona or
8 what you mentioned.

9 THE COURT: Okay. Can you answer his
10 question as it's worded?

11 THE WITNESS: I --

12 MR. DAVIS: It's a very direct
13 question. There was a child sex --

14 THE COURT: Why don't you rephrase it.
15 I may have messed it up.

16 THE WITNESS: Did you say --

17 THE COURT: Rephrase your question.
18 What are you wanting to ask?

19
20 BY MR. DAVIS:

21 Q. I want to know if you know about John
22 Perry, the coauthor of Mike Huckabee that is a child
23 molester that the church put children in his home and
24 he went off to Arizona and got treatment in April of
25 2008?

1 THE COURT: Okay. Hang on. Do you
2 know anything about a John Perry?

3 MR. DAVIS: John Perry.

4 THE WITNESS: I know what he's talking
5 about.

6 THE COURT: Okay. Well, answer that
7 first and then we can go forward.

8 THE WITNESS: So was it: Do I know, is
9 that what you --

10
11 BY MR. DAVIS:

12 Q. Well, y'all --

13 A. I'm sorry, I --

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

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

18 Q. You said there is nothing that you were
19 hiding. So I'm asking you: Okay, do you know about
20 that?

21 A. Yes, I do.

22
23 THE COURT: And the question is, just
24 so I'm clear: Who is John Perry?

25 MR. DAVIS: He's a coauthor with --

1 THE COURT: No, I'm not -- I'm trying
2 to help you break it down into.

3 MR. DAVIS: Okay. I'm sorry.

4 THE COURT: Break it down into snippets
5 of questions.

6 THE WITNESS: Sure. John Perry was a
7 former member, he was a deacon and he revealed to the
8 Session that he --

9 THE COURT: He what? I didn't
10 understand what you said, revealed?

11 THE WITNESS: Well, no, no, no.
12 Actually I don't think he revealed. I'm trying to
13 recall how we found out, but basically we learned
14 that he had molested REDACTED

15 THE COURT: Okay. What is your next
16 question?

17
18 BY MR. DAVIS:

19 Q. Do you know if there are any other
20 children molested because the church was putting
21 people in his safe house?

22 A. I'm sorry, what?

23 Q. You've already told me you weren't
24 hiding anything, and now you're telling me you know
25 something like that, that's kind of important to

Judge Dozier helped
Scott Troxel who
slipped up and told
the truth that John
Perry had revealed
the child sex abuse
to the Session. This
would have happen-
ed in or before April
2008 when Perry was
sent to PCS in AZ and
Pastor Larry Ferris
contacted Caroline
Cone. Police were used
on my family in July
2008.

1 know. Did anybody call the police?

2 A. About what?

3 Q. About John Perry.

4 A. Well, he -- this had been relayed to us
5 after his **REDACTED** had reached the age of 18.

6 Q. So you all don't report molesters to the
7 police?

8
9 GENERAL HARRIS: Your Honor, I mean,
10 I've let this go on. The Court has ruled on this.

11 THE COURT: Well, yeah, I mean, I have.
12 I think Mr. Davis has a right to -- for the jury to
13 try to understand, and I'm trying to facilitate this.
14 What's meant by this first sentence in this letter is
15 what he's talking about and what was brought up.

16 So I think in your questions, Mr. Davis,
17 you are putting assumptions and things that this
18 witness hasn't talked about. So if you can make your
19 questions more succinct, maybe we can get on here.

20 MR. DAVIS: I'm responding to him saying
21 we are not hiding anything.

22 THE COURT: Okay. So your question is
23 what?

24 MR. DAVIS: Well, the DA has just been
25 in the --

1 THE COURT: No, I'm not -- I'm just
2 asking you what your question is?
3

4 BY MR. DAVIS:

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

9 A. Basically, I don't recall exactly what
10 we did or what we learned at the time. I know that
11 everything we did was vetted by an attorney. I don't
12 remember if it was Worrick Robinson or who at the
13 time. But the statute of limitations or -- had run
14 out is my understanding from what I recall on the
15 offense and **Redacted** chose not to press charges.
16 And so there was not a burden on the Church's part,
17 from what I recall, to contact the authorities on
18 that. And he was immediately removed as a deacon.

19 Q. Do you know when that was?

20 A. I don't recall, no.

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

23 A. Yeah.

24
25 MR. DAVIS: Am I able to present the

1 board minutes from that meeting?

2 THE COURT: You wanting to show him
3 something?

4 MR. DAVIS: Yeah.

5 THE COURT: Okay. What is that?

6 And does the State -- show that to
7 the -- see if that have that or want to see it.

8 (Document passed.)

9 All right. What is your question?

10

11 BY MR. DAVIS:

12 Q. Can you tell me when that board meeting
13 was?

14 A. This says July 14th, 2008.

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

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

19 Q. Who else was there? It's got guest over
20 there on the --

21 A. Oh, yeah.

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

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

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

3 A. Yes.

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

6 A. Yes, uh-huh.

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

9 A. Let's see, it says: Worrick Robinson
10 provided background concerning Austin Davis.
11 Mr. Robinson advised that the Session's response to
12 the perceived security concerns did not have to be
13 the strongest legal response available, but a
14 reasonable response is necessary. After a full
15 discussion, deacons left the room for a session to
16 continue this dated meeting.

17 And so this was on July 14th. I believe
18 the letter you sent was on the 25th of June.

19 Q. June the 25th.

20 A. Right. So this would have been in our
21 stated meeting, I believe.

22 Q. A couple of weeks later?

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

25 Q. And do you see anything on there about

1 John Perry?

2 A. One of the items is to accept John
3 Perry's resignation from the diaconate.
4

5 THE COURT: From the what?

6 THE WITNESS: Diaconate, that's the
7 group of deacons. That's the plural of the group of
8 deacons.
9

10 BY MR. DAVIS:

11 Q. Does it say anything in those minutes
12 about telling Officer Chec or Worrick Robinson who I
13 think is the, the Union police guy or whatever,
14 represents the police when they go before the board.
15 Does it say anything there at all about them
16 reporting a known child molester to the police or is
17 all of the attention in that board meeting focused on
18 me?

19 A. There is -- no there is no mention in
20 the minutes. We may have gone into an executive
21 session concerning that.

22 Q. What does that mean? What does that
23 mean when you go to executive session?

24 A. Executive session is basically when any
25 guests are asked to leave.

1 Q. Like people that would come to the
2 meeting and be sitting there and hearing some of this
3 and then they leave the room?

4 A. Sure. Yeah.

5 Q. What gets talked about in those kind of
6 meetings? Do you keep minutes?

7 A. Oh, yes, we do.

8 Q. How do you get -- how does anybody get
9 them then that's in the church? How do you get
10 access to those kind of minutes?

11 A. I would say as far as executive sessions
12 are concerned the presbyteros have the opportunity to
13 look at them. But as far as individual members, I
14 would say it wouldn't be without the approval of the
15 Session.

16 Q. So it is normal practice that the PCA
17 that if you've got a child molester in your mist you
18 let that guy resign, you don't report him, but then
19 you take somebody else who is asking questions, and
20 you make him into a terror threat?

21
22 GENERAL HARRIS: I'm going to object to
23 form.

24 THE COURT: Okay. What they are
25 objecting to is the way you are phrasing the

1 question. So do you want to rephrase it?

2 MR. DAVIS: I'm sorry. I'm not
3 trained.

4
5 BY MR. DAVIS:

6 Q. What -- how does it get termed -- it
7 gets reported as threats and who are the real
8 threats? I mean, how do you -- I'm just trying to
9 ask: You all didn't deem John Perry a threat to
10 anybody?

11 A. Well, sure. Yes.

12 Q. What did you do?

A. Well, we did take action. He was no
longer a deacon. And also I mean, I'm trying to
think what else -- other actions we took at that --

Q. Did he --

18 THE COURT: Hang on let him finish.

19 THE WITNESS: I don't recall the timing
20 of when John left the --

21 MR. DAVIS: Can I help his memory? I
22 have another document I would like to --

23 THE COURT: Okay.

24 THE WITNESS: Well, he may have been
25 excommunicated from what I recall.

Recorded in Covenant
Board Minutes on July
14, 2008.

Covenant knew as early
early as 2007, or possibly
as far back as 2002 when
children were placed in
John Perry's "safe house."

1 BY MR. DAVIS:

2 Q. Do you recall when that was done?

3 A. No, I don't recall specific dates on
4 that.

5 Q. The next week when he got back from
6 treatment or...

7 A. Like I said, I don't recall.

8 Q. Okay. (Document passed.)

9

10 GENERAL HARRIS: Me we approach, Your
11 Honor?

12 THE COURT: Okay.

13

14 (Whereupon, the following bench
15 conference was conducted out of the hearing of the
16 jury:)

17

18 GENERAL HARRIS: Judge, I don't object
19 to the document itself. I do object to a document
20 not in its unredacted form. There are notes written
21 in the margins and a bunch of commentary on the side.

22 THE COURT: You are just wanting to
23 show him this?

24 MR. DAVIS: I'm sorry?

25 THE COURT: You are just wanting to

1 show him this to ask him about -- refresh his memory
2 about the date?

3 MR. DAVIS: Yeah. Because it's two
4 years later.

5 THE COURT: Okay. He just doesn't want
6 this admitted with your notes on it.

7 MR. DAVIS: That's fine.

8 THE COURT: You're not wanting this
9 admitted, you are just wanting to show this witness?

10 MR. DAVIS: Well, I would like to get
11 it admitted, I can white it out. I have whiteout.

12 THE COURT: Okay.

13 GENERAL HARRIS: There is something on
14 the second page.

15 MR. DAVIS: I can white it out. I got
16 whiteout over there.

17 THE COURT: What is this?

18 MR. DAVIS: That is the actual where
19 did -- what they read to the congregation.

20 THE COURT: Okay. Well, let's -- okay.
21 You can step back.

22 MR. DAVIS: Huh?

23 THE COURT: You can step back.
24
25

1 (Whereupon, the following was conducted
2 within the hearing of the jury:)

3
4 THE COURT: All right. You are
5 wanting, Mr. Davis, to show Mr. Troxel this in terms
6 of the dates?

7 MR. DAVIS: Yeah. And I would like to
8 have it presented. Like I said, I've got whiteout.
9 I've got some notes written on there, but I can white
10 them out if that's problem.

11 THE COURT: Okay. Well, let -- don't
12 worry about the handwriting on there. What is your
13 question?

14
15 BY MR. DAVIS:

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

19 A. This is -- the congregational meeting
20 was held June 6th, 2010.

21
22 THE COURT: And what was done then?

23 THE WITNESS: I'm sorry. There was a
24 congregational meeting part of -- and the purpose was
25 to inform the congregation that the Session had

1 excommunicated John Perry.

2

3 BY MR. DAVIS:

4 Q. And can you read what they said? That's
5 done in front of a meeting of people in the church.
6 Can you read what it says on the second page down
7 there? What they -- what as the congregation, right,
8 did all of the congregation get together just like we
9 did before the hearing, you all got together and
10 heard everything and then decided to excommunicate;
11 is that how it works?

12 A. Just a moment. Let me read this.

13 I'm sorry what was the question?

14

15 THE COURT: Is that what was read to
16 the congregation?

17

18 BY MR. DAVIS:

19 Q. For those of us who might not go to
20 church right now or haven't been in this PCA ruling
21 elder group deduce an act like that, to execute and
22 be able to read it in public, you are reading it in
23 church, right? You have a meeting and all of the
24 people coming and you read that to every body, so you
25 are pronouncing a --

1 A. Yes.

2 Q. -- decision --

3 A. Right.

4 Q. From the rulers?

5 A. Right.

6 Q. And so you are coming -- and that means
7 there has been some kind of **internal court case**
8 that's gone --

9 A. Exactly.

10 Q. Empowered but what they are actually
11 doing, is they are excommunicating him and cutting
12 him off from the Lord's table and saying you can't
13 have -- you can't have the wine, you can't have the
14 bread, you are cut off?

15 A. Correct. Correct.

16 Q. And so that was in June 6th, 2010?

17 A. Yes. Uh-huh.

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

20 A. Okay. Sure. It says where as John
21 Perry has confessed committing heinous and repetitive
22 sin against **Redacted** and has not shown evidence of
23 repentance, the Session of Cumberland Presbyterian
24 Church has declared he is excluded from it's acumen
25 and cut off from the fellowship of the church.

1 This session has taken this action with
2 sorrow and the desire to see him repent and return to
3 Christ and the fellowship of his church.

4 Q. And that action was taken two years
5 later?

6 A. Yes. Yes.

7 Q. No police was called?

8 A. No.

9 Q. Now, does it say in there -- does it say
10 he has shown no evidence of repentance? Is that what
11 that line says?

12 A. Yes, it's what it says.

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

16 A. No, he was not in leadership.

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

20 A. Not that -- not from what I recall. He
21 was given the opportunity. First of all, there is an
22 opportunity for him to reconcile with his wife. And
23 I believe, from what I recall is basically John just
24 stopped engaging. He was no longer coming to church **Untrue.**
25 and basically was not responding to any of the

1 overtures from the Session. It's part of the process
2 of discipline basically. And it was his lack of
3 response that basically lead to this decision, this
4 action.

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

7 A. Uh-huh.

8 Q. And you all excommunicated him?

9 A. Correct.

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

12 A. There was nothing -- from what we were
13 informed, there was nothing that could be
14 communicated as far as to the police because

15 Redacted did not want to press charges.

Victim 1 was told
the SOL expired
at 18.

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

18 A. Correct.

19 Q. But you weren't hiding anything?

20 A. Nope.

21 Q. You just -- this is just totally
22 disconnected. You are down there and you just fire a
23 letter off because I wrote a letter and said
24 something has been going on here for six years --

25 A. Like I said --

1 Q. -- and that goes back to 2002? How many
2 years were there be kids that could possibly --
3

4 THE COURT: Hang on. You are asking
5 multiple questions. Let him answer the one you had
6 asked. Go ahead.

7 THE WITNESS: Just the pattern on your
part of essentially harassing parishioners before
John Perry ever came to light, that situation ever
came to light, you were already harassing members.
As far as anytime anybody would join the
congregation, you would add them to your e-mail or
mailing list and begin to hit them as well, whether
it's e-mails or letters.

BY MR. DAVIS:

19 Q. So the PCS perceives people who care
20 about children, who stand up and speak out about it
21 that they proceed -- I didn't know about the
22 molestation at that time, all I was asking was what
23 about these other children placed in this house
24 because I was concerned about them because I saw some
25 signs that bothered me. So what you're telling me
was that you guys knew about it, I didn't. But
that's the way you all handled child molesters?

So much perjury. Totally untrue. I started mass emailing all church members in 2013, not before John Perry came to light. He came to light for them as early as 2007. I started emailing Covenant Members after Police told us the SOL had expired at 19 on Dec. 5, 2012, and around the time Police lied to Covenant Members in early 2013: "There is nothing to these claims." Police gave the Covenant cult-army the "greenlight" to threaten and intimidate my family. Still on-going as of Aug 27, 2020 with the protection of Nashville Police and TN Courts.

1 A. No. That's --

2

3 THE COURT: Okay. He's answered that.

4

5 BY MR. DAVIS:

6 Q. How do you handled child molesters?

7

8 THE COURT: You talking about generally
9 or Mr. Perry?

10

11 BY MR. DAVIS:

12 Q. I want to know what the PCA does. I
13 want to know what you do. What is your -- what is
14 your -- what is your operational standard procedure
15 when child molesting going on?

16

17 GENERAL HARRIS: Judge, again, we have
18 so far into the --

19 THE COURT: Okay. I will sustain the
20 objection. This isn't about what they do every
21 single time they might become aware of some
22 allegation.

23 What is your next question?

24

25 BY MR. DAVIS:

~~AUG 18~~

~~Jan 26, 2020~~ – To date, Nashville Police have never contacted Greg Lurie.

DECLARATION

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 former wife, Carolyn Lurie.

On October 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 **RED** 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 that 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 **RED** 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.

Date: 8/8/14

Gregory C. Lurie
Signature

GREGORY C. LURIE
Printed Name

DECLARATION

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 June 25, 2008, my husband, Austin Davis, wrote a letter to JIM BACHMANN asking him to tell the truth about the scandal within Covenant Presbyterian Church. On June 29, 2008, when my family came up to the entrance of Covenant as we had done since 1992, there was a line of large men in the entrance hall. Several had hearing devices in their ears. I did not recognize any of them. I discovered the names of a few: WORRICK ROBINSON, Troy Stackhouse, Juan Knight. I heard WORRICK ROBINSON tell Austin he could not enter the building and made it clear he needed to leave the property immediately. We were shocked, in fear, and the air was charged with electricity since we were not sure if the men would hurt us, have Austin arrested, or what they planned to do to us. After being blocked in the doorway for a few minutes as WORRICK ROBINSON and Austin talked, Austin agreed not to enter the building, but asked if his family could enter the Sunday service. WORRICK ROBINSON was hesitant but did agree to let us enter the service for this one time. We were all terrified and confused, so we just entered the large reception area and stayed seated. I remember choosing to sit in the needlepoint tapestry chair that I personally spent a year working on when my daughter, Daisy, was little. My heart and mind were racing, but I tried to stay calm to focus on what was happening around me. After a few minutes, Daisy became agitated and announced that she was going to find her youth pastor, Phil Roach. I remember feeling alarmed when she left the foyer and headed to the corridor, as two large unfamiliar men followed her. As a protective mother, I felt danger for her and chased after them. Asserting my authority, I told Daisy to go ahead to

find Phil and asked the unfamiliar men to let her go. I wanted to diffuse the tension of the moment by talking to the men. I introduced myself and acknowledged that I understood we were being "guarded." One of the men, Troy Stackhouse, asked me what was going on. I told him that I did not know and I asked him if he was armed. He looked at me very seriously and replied that he was told to be prepared for "anything." I gasped realizing that he was armed and asked him if he would have shot me if I had tried to run away from him. He repeated that he had been told as a member of the security team, led by WORRICK ROBINSON, to be prepared for anything to happen. I remember wondering to myself how they might have interpreted Daisy's running from them if I had not been there.

In the early evening of July 2, 2008, I was at home with my 13 year old daughter. I was on the phone with a friend when I heard a persistent hard knocking at my door with such insistence that it caused my heart to pound with fear. The minute I opened the door and saw two police officers there I knew whatever the reason they were there, it was bad. My flash fear was that my husband had been in a wreck. He had gone to baseball practice with our son earlier. But the very first thing I remember hearing Sgt. Twana Chick say was "Is everything okay?" It struck me as a staged thing and then she asked me if my children were OK and it immediately clicked in me what she was doing by pretending to check on our safety. She came with a prepared line of questioning that seemingly painted my husband in a very bad light. She asked questions about the church and why we had gone to church on Sunday, which was a few days earlier. I was extremely afraid. I did not know to call a lawyer, so I went into protection mode. I consciously thought at the time - I believe this officer had been lied to and sent on a witch hunt to scare us. I offered to call my husband on the phone to get him to come home to

answer her questions. Her line of questioning was looking to find evidence that there was something mentally wrong with my husband or that my family was in an unsafe situation. I believed that if she could see my husband to talk to him, she would immediately begin to see that he was strong, sensible and honest and she would realize she had been misled by JIM BACHMANN. That day I did not know why JIM BACHMANN had been trying to discredit Austin, but I knew that something was very wrong at Covenant for JIM BACHMANN to use the police on my husband who had coached basketball with JIM BACHMANN and went to Vanderbilt ball games with JIM BACHMANN while knowing him for 16 years. Once Austin came home it seemed the conversation went on for another hour and a half as Sgt. Chick asked him a lot of personal questions about his mental state, his employment history, where he had been working and presently worked, and she seemed to already know a great deal of information about Austin before she came to our house. We told Sgt. Chick and Detective Coddling everything we knew or thought we knew about what was going on. Mostly it had to do with the terrible mistreatment of Greg Lurie and his children by Stuart Latimer, JIM BACHMANN, Larry Ferris, and the elders of the church. As the questions were continuing with my husband, I felt that Sgt. Chick had been sent to bully and intimidate us as a follow-up to what had already been done to us a few days earlier at the church. I did not believe that any of her questions or motives were sincere the longer the interview went extended. I felt like Tim Coddling was a nice guy who seemed confused by what was going on and did not ever say hardly anything but I did not think that Detective Coddling came with any kind of hidden agenda. But there was no way to know for really sure. I was afraid and never wanted to ever return to Covenant again and I did shut up after that visit and intended to be quiet about it since I was scared for my family. I think

I cried every day for a month afterwards. I was afraid and embarrassed to tell anyone. I knew no one would believe that a minister of the gospel like JIM BACHMANN could do something this evil to an innocent family. Most of my friends in the community and Covenant members still don't believe it is possible. But it's the truest thing I know.

On July 6, 2008, this was the day my 13-year old daughter was intimidated again by the unfamiliar men at the church when she came as an invited guest of youth leader Betsie Carlson. Betsie Carlson was the assistant youth leader who invited Daisy via email to return to Covenant the Sunday after the first assault. Austin and I both were concerned about the motivation for us receiving the invitation and fearful of how the police would perceive Austin as an "over-controlling dad" if we did not allow Daisy to return to the church property when invited by a trusted youth leader. After much anguish and discussion, we did not fully understand everything going on at the time and we were in a state of shock and we both finally agreed to trust Betsie Carlson to avoid any type of unnecessary risk that the police might be summoned against us to conduct more investigation since we did not wish to lose our children with a ruling by a Davidson County judge like we had seen done with Greg Lurie. On that Sunday morning, my mother took my 13-year old daughter to church and she picked her up later and they both told me upon arriving back at the house that Daisy was being guarded by two unfamiliar men when my mother picked her up.

Several weeks later we began trying to figure out why all this hostile aggression was being aimed at us. I spoke with Betsie Carlson on the phone and she told me that she did not know what was going on but that she had wondered why the two unfamiliar men were standing outside of the classroom door on June 29, 2008 and July 6, 2008. I asked her if JIM

BACHMANN knew that Daisy was in the building on July 6th and she said yes which did not surprise me since JIM BACHMANN knows about everything in the church. Betsie was at a loss on what to do about Daisy, so she naturally went to JIM BACHMANN to follow up with him on what to do or if she should invite Daisy to come back to church on July 6th and JIM BACHMANN was very glad to have Daisy invited back the following Sunday and he approved the invitation to be offered by Betsie Carlson to the exclusion of the rest of the Davis Family. I was in the Ensworth School pick up line after school while making this phone call and I remember being conscious of the fact that I needed to get off my cell phone before the car line started moving. The last thing Betsie said to me was that she disagreed with JIM BACHMANN trying to keep Austin out of the church but that she had to respect his authority as the Pastor and not to question JIM BACHMANN'S leadership. I remember being stunned that she was willing to compromise her integrity in this way, but I thought that JIM BACHMANN sought control over all the church people in this way, people, elders, and fellow staff members, and I felt like he had even been manipulating Betsie when Daisy was invited back to the church as a 13-year old during the very same week that two police officers were sent to our home which frightened and scared our two children.

On June 6, 2010, Daisy was enduring tremendous suffering at Harpeth Hall and she felt that an apology from JIM BACHMANN would help stop the bullying, harassment and isolation. Daisy wanted the respect of her peers but she really did not know how to handle the abnormal circumstances as a young girl who was only 15 years old. She felt compelled to go back to Covenant desperate for some type of remedy or break through so she asked me, my

mother and her brother to go back with her which we did on this date. JIM BACHMANN wrote us the following week to express how glad he was for all of us to be back at Covenant.

On August 16, 2010, the Covenant Board had a meeting and they sent me and my mother letters to say that we were not welcome at the Covenant services. On August 22, 2010, after the church service, WORRICK ROBINSON chased me, my mother and my daughter from the front entrance of Covenant down the long sidewalk to intimidate us. My mother told him she was very afraid of him and she told him to leave her alone. He handed me an envelope but I threw it down on the ground.

During the summer of 2012, the child-molestation victim began to contact me for a series of lunch and dinner meetings. RED told me RED had been molested approximately 25 times by John Perry when RED was around 11 years. RED told me that RED finally broke RED silence around July 11, 2007, after RED turned 18 and RED began telling friends, members Redacted, paid counselors, school officials and Covenant Church leaders. I was concerned about what RED was telling me and did not know what to do or if the information was completely true. I worried that a trap might get me or my husband in further trouble with Metro Police if I started telling anyone what I had heard and my husband as a "harassment suspect" with the Metro Police made a false allegation against anyone associated with Covenant. Because Austin was still under threat of arrest with any additional contact with a Covenant member, I wanted to make sure that the information provided to me by the victim was accurate and trustworthy. I spoke with some other people who had belonged to Covenant in an effort to remove the cloud of uncertainty surrounding the victim's story since I was not up inside of Covenant when all of this began leaking out to many families within Covenant and beyond Covenant beginning 2007 and beyond.

I was able to confirm the veracity of the story with other sources, and conversations with the victim and others were recorded. I do have audiotapes of conversations. I have endured hostility, shunning, and ridicule for six years due to the hysteria surrounding my husband.

Date: August 7, 2014

Catherine Davis
Signature

CATHERINE DAVIS
Printed Name

DECLARATION

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 of Covenant's Building 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 August 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.

Date: August 7 2014

Nancy S Fleming
Signature

NANCY S. FLEMING
Printed Name

DECLARATION

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 June 25, 2008, my father wrote a letter to some members of Covenant asking for JIM BACHMANN to tell the truth. A few days later on June 29, 2008, WORRICK ROBINSON and five or six other men blocked the entrance of the church and stopped my family at the front door of the church and began interrogating my dad. My youth pastor at the time, Phil Roach, and I made eye contact, but he looked away and did nothing to help.

On July 2, 2008, two police came to our house. I was told to stay away while my mom spoke to them and waited until my dad and brother got home. I was afraid that they were going to take my brother and I away from my parents and hand us over to DCS. I did not know exactly what was going on with the police when they asked my parents questions, but I knew that it was bad and made my brother and I scared that something might happen to our parents.

Around the time that the police came to our house, I was texting back and forth with youth leader, Betsie Carlson, and she checked with JIM BACHMANN and cleared my return to the property with JIM BACHMANN. My dad was unsure of the motives or what was really going on with everything but he and my mother reluctantly agreed to let me go back to church the following Sunday with my grandmother driving me. I returned on July 6, 2008. Three men I was unfamiliar with paced the halls near my classroom and sat outside my classroom until class was dismissed. I lingered, hesitant to leave, in case the men outside the class were not waiting on me. When I did exit the room, two of the men followed me and the other stationed himself at the door. When I reached the lobby outside the sanctuary, one of the unfamiliar men tried to make casual small talk. He asked about my family and how my little brother was. I felt uncomfortable;

I felt like I was being pushed for inside information and once again, I was afraid they would hand my brother and I over to DCS because of the completely bogus and false allegations that my dad was "crazy" and a "dangerous threat." WORRICK ROBINSON seemed to be the man in charge of the men in the lobby and the men guarding each entrance to the church. WORRICK ROBINSON was standing near the pastor's changing room with JIM BACHMANN.

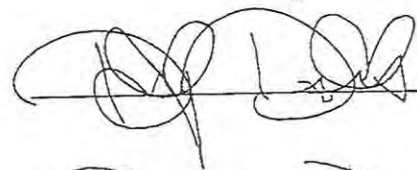
On May 22, 2010, I was in the parking lot outside of Starbucks when Jody Elder asked me multiple personal questions about school, family, etc... I felt very uncomfortable because I was afraid that he was trying to get information out of me just like the men at Covenant had tried to do at Covenant. I didn't want him to go back to JIM BACHMANN or the police and twist my words against my family again. My dad asked me to go wait in the car and then he had a conversation in the parking lot with Jody and told him to stay away from me.

On June 6, 2010, I returned to Covenant on this day hoping that JIM BACHMANN would publicly apologize for the harassment of my family so that the bullying, jokes, and meanness to me at Harpeth Hall and elsewhere would stop. JIM BACHMANN went on with his sermon, looking down at where I was sitting on the front row, but he said nothing.

On August 29, 2010, Tom Pulliam, Herb Kneeland, and Dr. Lee Bryant blocked my mother and grandmother from entering the sanctuary, outside of the doors. I was expecting to be stopped as well, but was able to scoot around the men and slip inside. My mother and grandmother told the men that I, a minor, was inside and that they needed to be with me. They were allowed in, but as we were leaving church, we were chased down in the parking lot by WORRICK ROBINSON who handed all three of us letters. We did not accept them or read them and continued to walk to the car.

Later, WORRICK ROBINSON appeared at the Harpeth Hall campus. As I was walking up the stairs, he was walking down. I hurried to my locker, grabbed my phone, and hurried into the art building, hid in the elevator and called my dad at work. I thought WORRICK ROBINSON had come to confront me at my school. After I got off the phone with my dad and made my way back across the campus, I noticed WORRICK ROBINSON was walking behind me into one of the buildings. This scared me again and I hurried upstairs and hid. My father and my mother both left what they were doing and hurried to the Harpeth Hall campus to check on me. My dad spoke with Ms. Hill about WORRICK ROBINSON being on the campus but no one at Harpeth Hall believed the concerns of my dad.

Date: August 7, 2014

 _____
Signature

Daisy Davis
Printed Name

Nashville Police said Covenant Leadership acted appropriately to excommunicate John Perry after Covenant Leadership first learned about the child sex abuse in 2010. However, child sex abuse therapist, Caroline Post Cone, testified that Covenant Leadership knew as early as April 2008. See page 1.

CONGREGATION MEETING MINUTES

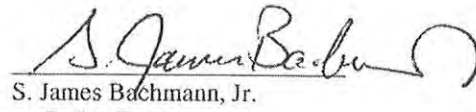
Covenant Presbyterian Church
33 Burton Hills Boulevard
Nashville, Tennessee 37215

A called meeting of the congregation was held Sunday, **June 6, 2010**, 9:30 A.M at the church to announce a disciplinary action taken by the Session.

Moderator: Pastor Jim Bachmann

- I. The meeting was opened in prayer.
- II. Elder Ron Kimery was appointed clerk for this meeting.
- III. Elder John Avery, member of the Discipleship Committee, read the opening passages from the Book of Church Order regarding discipline. He then informed the congregation that the Session had excommunicated John Perry. (copy of announcement attached).
- IV. The meeting was closed in prayer.


Ronald P. Kimery
Elder


S. James Bachmann, Jr.
Senior Pastor

It is my charge this morning to inform you of a disciplinary action recently taken by the Session. Before doing that I will read the opening passages from the Book of Church Order Part II regarding Discipline.

27-1. Discipline is the exercise of authority given the Church by the Lord Jesus Christ to instruct and guide its members and to promote its purity and welfare. The term has two senses:

a. the first referring to the whole government, inspection, training, guardianship and control which the church maintains over its members, its officers and its courts;

b. the second a restricted and technical sense, signifying judicial process.

27-2. All baptized persons, being members of the Church are subject to its discipline and entitled to the benefits thereof.

27-3. The exercise of discipline is highly important and necessary. In its proper usage discipline maintains:

a. the glory of God,

b. the purity of His Church, and

c. the keeping and reclaiming of disobedient sinners. Discipline is for the purpose of godliness (I Timothy 4:7); therefore, it demands a self-examination under Scripture.

Its ends, so far as it involves judicial action, are the rebuke of offenses, the removal of scandal, the vindication of the honor of Christ, the promotion of the purity and general edification of the Church, and the spiritual good of offenders themselves.

27-4. The power which Christ has given the Church is for building up, and not for destruction. It is to be exercised as under a dispensation of mercy and not of wrath. As in the preaching of the Word the wicked are doctrinally separated from the good, so by discipline the Church authoritatively separates between the holy and the profane. In this it acts the part of a tender mother, correcting her children for their good, that every one of them may be presented faultless in the day of the Lord Jesus.

Having read those words, the announcement of discipline is as follows:

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.

In an abundance of caution, protected information is REDACTED in submission to Attorney Larry Crain's permanent injunction granted on 9/24/2018.

Copy

REDACTED

EIGHTH CIRCUIT

IN THE ~~FOURTH~~ CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

SUSAN ANN PYLE PERRY,)
Plaintiff,)
vs.)
JOHN SMITH PERRY,)
Defendant.)

2009 MAR 13 PM 4:11

RICHARD R. BOCKELMANN, CLERK

DOCKET NO.: Bddl D.C.

REDACTED

COMPLAINT FOR DIVORCE

1. Plaintiff, SUSAN ANN PYLE PERRY (hereinafter called "Wife") is married to defendant, JOHN SMITH PERRY (hereinafter called "Husband"). The following is the statistical information pertaining to said parties required by T.C.A. § 36-4-106:

WIFE:

- a. Full maiden name of Wife: Susan Ann Pyle
- b. Race: Caucasian
- c. Residence address: 6437 Bresslyn Road, Nashville, TN 37205
- d. Length of residence at above address: 10 years
- e. Date and place of birth: April 12, 1954, South Charleston, West Virginia
- f. Number of previous marriages: None
- g. Member of the Armed Services of the United States: No
- h. Employed: Mother

HUSBAND:

- i. Full name of Husband: John Smith Perry
- j. Race: Caucasian

Ex. 6

Copy

k. Residence address: Hallmark Inns of America, 309 W Trinity Lane, Nashville,
TN 37207

l. Length of residence at above address: Three months

m. Date and place of birth: October 4, 1952, Greensburg, Kentucky

n. Number of previous marriages: None

o. Member of the Armed Services of the United States: Yes

p. Employed: Self-Employed Author

q. Date and place of marriage of the parties: February 26, 1977 in Larchmont,
New York

r. Date of separation of the parties: April 26, 2008

s. Residence of the parties at the time of their separation: 6437 Bresslyn Road,
Nashville, TN 37205

t. **REDACTED**

u. Grounds for divorce relied on by Plaintiff: Irreconcilable Differences,
Inappropriate Marital Conduct

JURISDICTION

2. Husband and Wife have been bona fide residents of Tennessee for more than six (6)
months.

MINOR CHILDREN

3. The minor child of this marriage presently resides with Wife and has resided with Wife
in Tennessee since birth or for the last five (5) years. No person other than Husband has

Copy

claims to custody or visitation rights with respect to the minor child. Wife is not aware of and has not participated in any custody proceedings, other than this divorce action, concerning said minor child.

4. Wife is a fit and proper person to have custody of the parties' minor child. Husband is able to provide a reasonable amount of support for the child.

ALLEGATIONS

5. The parties own real property located at 6437 Bresslyn Road, Nashville, TN 37205.

6. The parties own various items of household furniture and furnishings.

7. The parties incurred some debts during the marriage, and to the best of the Wife's knowledge, the Husband has incurred a large sum of credit card debt in his name only.

8. 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 Husband's past acts of abuse and molestation of **REDACTED**

9. Wife has the following ground(s) for divorce:

- (a) The parties have irreconcilable differences;
- (b) Husband has been guilty of inappropriate marital conduct;
- (c) Husband has been guilty of such cruel and inhuman treatment or conduct towards her as renders cohabitation unsafe and improper;

WHEREFORE, WIFE PRAYS:

- 1. For process to issue and be served on the Husband, requiring him to answer, but his oath thereto is waived;
- 2. For an absolute divorce;

Copy

3. For alimony, both *in solido* and *in futuro*, as well as rehabilitative, transitional and pendente lite, including, but not limited to, requiring Husband to acquire and maintain hospitalization and major medical insurance covering Wife;
4. For all right, title, and interest in the personal property already in her possession to be divested out of Husband and vested in Wife;
5. For all right, title, and interest in the parties' real property described herein to be divested out of Husband and vested in Wife;
6. For Husband to be ordered to pay as alimony any and all debts of the parties and to indemnify and hold Wife harmless thereon;
7. For restoration of her maiden name, Pyie;
8. For the Court to approve the marital dissolution agreement that the parties may execute and file;
9. For additional alimony, the Wife be awarded her attorney fees in connection with this action for divorce;
10. For the litigation tax and costs to be taxed to Husband; and
11. That the Wife has such further, different and general relief to which she may be entitled.

THIS IS THE FIRST APPLICATION FOR EXTRAORDINARY PROCESS HEREIN.

Respectfully submitted,

ROBINSON, REAGAN & YOUNG, PLLC

BY: 

WORRICK G. ROBINSON, IV #15009
Attorney for Plaintiff/Wife
260 Cumberland Bend
Nashville, TN 37288
(615) 726-0900

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STATE OF TENNESSEE
COUNTY OF DAVIDSON

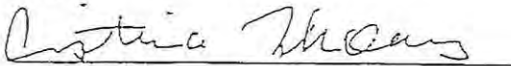
OATH

I, SUSAN ANN PYLE PERRY, being first duly sworn, makes oath that I am the Plaintiff/Wife in the above-stated action, that I have read the foregoing Complaint for Divorce, I know the contents thereof, and that the same is true and correct to the best of my knowledge, information, and belief; that this Complaint for Divorce is not made out of levity or collusion with the Defendant/Husband; that this Complaint is made for the causes mentioned therein; that I am unable to bear the expense of this cause, but is justly entitled to the relief sought.


SUSAN ANN PYLE PERRY

SWORN TO AND SUBSCRIBED before me this 4th day of March

2009.



NOTARY PUBLIC

My Commission Expires: 3/21/09



MAR. 21, 2009

Copy

IN THE EIGHTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE

FILED

In Re: Court Mandated Parenting Skills Seminars 2004 APR 19 AM 11:29

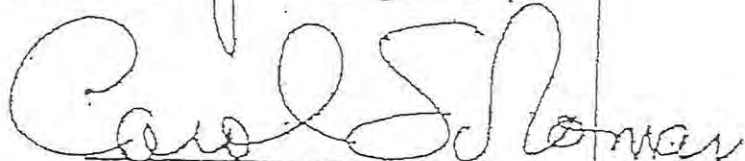
RICHARD R. PROKE, CLERK

ORDER

IT IS HEREBY ORDERED, ADJUDGED ~~AND DECREED~~ that all parents who file for either contested or uncontested divorce in Davidson County, when their case is assigned to the Eighth Circuit Court, shall be required to attend a Parenting Skills seminar and receive a certificate from such seminar, in order to be granted a Final Divorce. When a divorce is granted by Default Judgment, the party seeking the divorce must complete the Parenting Skills seminar. However, it will not be held against the Party seeking the divorce by default if the unresponsive party fails to answer or attend the parenting seminar and the Final Divorce may still be granted.

The Eighth Circuit Court finds that these classes are very important to the health and well-being of the children of Davidson County, and therefore, the Court will no longer grant "Motions to Waive" attendance at the Parenting Seminars.

ENTERED this 19 day of April 2004.


JUDGE CAROL SOLOMAN

IN THE EIGHTH CIRCUIT COURT OF DAVIDSON COUNTY
AT NASHVILLE, TENNESSEE

2016 MAR 14 PM 4:31

RICHARD R. HUBBARD, CLERK

R
Plaintiff,
REDACTED
v.
AUSTIN DAVIS,
Defendant.

Case No. **R** *Kevin B. Jones*

ORDER DENYING PLAINTIFF'S REQUEST FOR A TEMPORARY INJUNCTION

This matter came to be heard on March 14, 2016 before the Honorable Kelvin D. Jones, III upon Plaintiff's Petition for a Temporary Injunction. The Plaintiff was represented by Attorney Larry Crain and the Defendant appeared *pro se*. Based upon the testimony of the parties and witnesses, the evidence presented, the arguments of counsel and the Defendant, the findings of facts and conclusions of law recited by this Court while rendering its opinion and the entire record, this Court finds that the temporary injunction should not be issued. The Court's ruling is based upon the following findings of facts and conclusions of law:

Findings of Fact

The Plaintiff filed **R** Verified Complaint on February 18, 2016. The Defendant was served on March 2, 2016. In **R** original Verified Complaint, the Plaintiff alleges four counts, two of which are causes of action for invasion of privacy. The Plaintiff did not bring a claim for defamation in **R** original Verified Complaint, but added that claim in an Amended Complaint that was filed on the morning of this hearing.

In **R** prayer for a temporary injunction, the Plaintiff specifically asks the Court to enjoin "the Defendant, and all those acting in concert with him, from publishing, disseminating, or posting on any social media or Internet site, or through the use of any written or digital media of

In an abundance of caution, protected information is REDACTED in submission to Attorney Larry Crain's permanent injunction granted on 9/24/2018. Larry Crain represents child-molester John Perry, who redefined heinous, repeated child sex abuse across state lines as a "private" difficulty in his global public statement to the London Daily Mail on June 11, 2015.

any type, any reference to any events allegedly taking place during the Plaintiff's childhood, whether the same are believed by the Defendant to be truthful or otherwise."

At today's hearing on March 14, 2016, the Plaintiff substantively argued that Defendant has defamed the Plaintiff by publishing and/or publicizing false statements regarding the Plaintiff's role in an alleged child-molestation cover up. The Plaintiff testified that the Defendant's prior statements regarding **R** role in the alleged cover up are false. The Defendant, on the other hand, contends that any statement made about a cover up, in which he alleges the Plaintiff was involved, are true. The Plaintiff testified that **R** was a victim of child molestation perpetrated by John Perry.

Conclusions of Law

The Plaintiff asks for a temporary injunction pursuant to Tennessee Rule of Civil Procedure 65.04. Under that Rule, the Plaintiff must clearly show that **R** rights are being or will be violated by an adverse party and that **R** will suffer immediate and irreparable harm in the absence of an injunction.

There are four factors for the Court to consider in deciding whether to grant injunctive relief in this case:

- (1) The Plaintiff's likelihood of success on the merits
- (2) Irreparable harm to Plaintiff that would result if the injunction is not granted
- (3) Potential harm to the Defendant if the injunction is granted
- (4) The public interest

Weighing all of these factors, the Court finds that the temporary injunction sought by the Plaintiff should not be granted.

With respect to the Plaintiff's likelihood of success on the merits, the Court notes that its evaluation of this factor is limited in that the Defendant did not have an adequate opportunity to

respond to the Plaintiff's claim for defamation, which Plaintiff substantively argued at today's hearing. Without adequate notice of this claim, the Defendant did not have an opportunity to call any witnesses or present other proof to rebut the Plaintiff's testimony that some of the Defendant's prior statements regarding **R** are false. Under these circumstances, the Court finds that the alleged falsity of the Defendant's statements is still in dispute.

For the Plaintiff's invasion of privacy claims, the Court finds that the United States Supreme Court case of *Cox Broadcasting v. Cohn*, 420 U.S. 469 (1975) is most on point. In that case, the father of a deceased rape victim brought action against a broadcasting company and others to recover damages for invasion of father's right to privacy, which invasion allegedly occurred when the broadcasting company, in contravention of a Georgia statute, identified the victim during television coverage of the trial of the alleged rapist. On appeal from a Georgia Supreme Court ruling which found that the Georgia statute did not conflict with the First Amendment, the U.S. Supreme Court reversed. In making its ruling, the Court observed that "the interests of privacy fade when the information involved already appears on public record, especially when viewed in terms of the First and Fourteenth Amendments and in light of the public interest."

In the case at bar, there have been at least two global news outlets that have published stories identifying John Perry and his molestation of a young **R**. Plaintiff testified that **R** granted one of these outlets, *Buzzfeed*, an interview. There are numerous Court documents filed in connection with other lawsuits in which John Perry's commission of sexual molestation is referenced. In light of the case law and evidence presented at the hearing today, the Court cannot definitively find that the Plaintiff has a substantial likelihood of success on invasion of privacy claims or **R** defamation claim.

**Incorrect stories
which have not
been corrected.**

With respect to irreparable harm to the Plaintiff in the absence of an injunction, the Court finds that, most unfortunately, the Defendant's prior publicization has caused much harm to the Plaintiff by re-opening traumatic events from **R** childhood. The Court finds the Plaintiff's testimony that further publication of the event will continue to cause **R** harm to have been particularly moving. However, the Court must balance the harm to the Plaintiff with the potential harm to the Defendant in granting an injunction.

The molester and his cover-up have continued to harm the victim, and other children.

With respect to the potential harm to the Defendant if the injunction is granted, the Court notes that any such injunction against the Defendant would qualify as a prior restraint of the Defendant's speech. Tennessee and federal Courts have notoriously held that such prior restraints are strongly disfavored and, in the context of a defamation claim, are permissible only after a specific finding by the trial court that the Defendant's statements are false. *See In re Conservatorship of Turner*, 2014 WL 1901115 (Tenn. Ct. App. 2014). As discussed in the Court's evaluation of the first factor, the Court has not had an adequate opportunity to make such a finding. Accordingly, the Court finds that the potential harm to the Defendant – a prohibition of constitutionally protected speech – is grave.

No merit trial occurred. The permanent injunction was imposed without "specific findings" by a court.


Lastly, the Court similarly finds that the public interest resides primarily in the Court's observance and protection of constitutional rights. The Court does not intend for this finding to diminish in any way the Plaintiff's own compelling interest in preventing the unlawful publicization of **R** private life. However, as observed by the Supreme Court in the *Cox Broadcasting* case, the "the interests of privacy fade when the information involved already appears on public record, especially when viewed in terms of the First and Fourteenth Amendments and in light of the public interest"

Public Interest? Should American voters be informed?

Based on the foregoing, the Court respectfully **DENIES** the Plaintiff's petition for a temporary injunction.

It is so Ordered.

Entered this the 14th day of March, 2016.

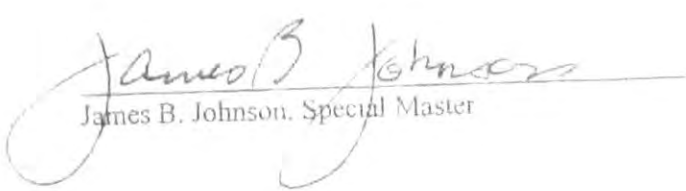

Kelvin D. Jones, III,
Judge, Eighth Circuit Court

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum and Order has been delivered via U.S. Mail on this the 14th day of March, 2016 to:

Larry L. Crain
Crain Schuette & Associates
5214 Maryland Way, Suite 402
Brentwood, Tennessee 37027
Attorney for the Plaintiff

Austin Davis, *pro se*
5211 Park Avenue
Nashville, TN 37209


James B. Johnson, Special Master



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, REDACTED. The plaintiff testified under oath that [redacted] 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, "REDACTED," 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

In an abundance of caution, protected information is REDACTED in submission to Attorney Larry Crain's permanent injunction granted on 9/24/2018. Larry Crain represents child-molester John Perry, who redefined heinous, repeated child sex abuse across state lines as a "private" difficulty in his global public statement to the London Daily Mail on June 11, 2015.

Ex 8

In an abundance of caution, protected information is REDACTED in submission to Attorney Larry Crain's permanent injunction granted on 9/24/2018. Larry Crain represents child-molester John Perry, who redefined heinous, repeated child sex abuse across state lines as a "private" difficulty in his global public statement to the London Daily Mail on June 11, 2015.

SHORT
VERSION

9/19/18 2:41 p

FILED

msmy

REDACTED

VS

AUSTIN DAVIS

FILED

JAN 22 2019

Clerk of the Appellate Courts
Rec'd By

Deposition of

CAROLYN CONE

September 11, 2018

Man Act Federal
Crime - No Statute
of limitations for
child sex abuse
across state lines.

H

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Ex 8

1 Q. In the injunction hearing, [REDACTED] answered the
 2 question that [REDACTED] had been meeting with you for ten
 3 years, so that would take it back to 2006.
 4 Did you ever counsel with [REDACTED] 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 [REDACTED] and [REDACTED] after?
 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 [REDACTED] and [REDACTED].
 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 [REDACTED] at first and gave him my name. And otherwise, I
 25 don't have any idea why I got the call.

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 [REDACTED] 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 [REDACTED] go over that or give you any
 25 information on those states, where it was?

1 Q. Do you know any of the people that are over in
 2 Covenant in leadership?
 3 A. Do I now, or did I then?
 4 Q. Did you then?
 5 A. I knew 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 Eades who happened to be kind
 9 of in the mental health --
 10 A. I did not know Joe Eades. I did not know him.
 11 Q. Is Dr. 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 older, Anderson. The one that wrote the
 18 book, "Dying for a Drink."
 19 A. And so, was he over 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 Vanderbilt?
 24 A. Yes.
 25 Q. And he's in that program or something; isn't

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, [REDACTED] was 18 years old. And because [REDACTED] 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 [REDACTED] 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

Covenant
 Pastor
 Larry
 Ferris
 knew in
 April
 2008.
 Police
 used in
 July
 2008.

Federal
 Mann
 Act
 Crime

→ What?

1 that you have.
2 Q. I don't have -- oh, this exhibit?
3 A. Yeah. That was me rectifying about [REDACTED] and
4 it has [REDACTED] name on it. My understanding is that
5 you're the one that posted that.
6 Q. It's got somebody blacked out here. I don't
7 know what it says.
8 MR. DAVIS: I think I've had enough.
9 MR. CRAIN: All right. I have no further
10 questions, and that will conclude the deposition.
11 THE VIDEOGRAPHER: Thank you. The time
12 is 2:00 p.m. We're off the record.
13 (Whereupon, the deposition
14 concluded at 2:00 p.m.)
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REPORTER'S CERTIFICATE

1
2
3 STATE OF TENNESSEE
4 COUNTY OF DAVIDSON
5 I, ARIELA PASTEL, Licensed Court Reporter,
6 with offices in Nashville, Tennessee, hereby certify
7 that I reported the foregoing deposition of CAROLYN
8 CONE by machine shorthand to the best of my skills and
9 abilities, and thereafter the same was reduced to
10 typewritten form by me.
11 I further certify that I am not related to any
12 of the parties named herein, nor their counsel, and
13 have no interest, financial or otherwise, in the
14 outcome of the proceedings.
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Ariela Pastel

ARIELA PASTEL, LCS
Licensed Court Reporter (TN)
LCS # 776 - Expires 6/30/13

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EX 8

NASHVILLE POLICE SILENCED AUSTIN DAVIS IN JULY 2008. PER SWORN TESTIMONY, COVENANT PASTOR LARRY FERRIS KNEW ABOUT THE CHILD SEX ABUSE IN APRIL 2008.



Colleen Post Cone – Child Sex Abuse Therapist – Expert Witness Against Molester Austin Davis – Exposing a “Mann Act” Federal Crime Cover-Up



Ex-Covenant Pastor Larry Ferris – Sr. Pastor @ Covenant Presbyterian Church in Easley, SC

1 CROSS EXAMINATION BY MR. DAVIS:
2 Q. Ms. Cone, did you say you had learned
3 about the child molestation in 2008?
4 A. Yes.
10 Q. So when in 2008 did you first start
11 counseling REDACTED
12 A. April.
13 Q. Or was it 2007, whenever it was?
14 A. It was 2008, and it was April.
15 Q. April. And so when the church calls you,
16 do you know who it was in the church that called
17 you?
18 A. One of the pastors.
19 Q. Do you remember who?
20 A. I believe it was Pastor Ferris.
21 Q. Pastor Larry Ferris? Pastor Larry Ferris
22 called you in April of 2008?
23 A. Yes, sir.
8 Q. (BY MR. DAVIS) Did you know other
9 children had been put in the molester's house back
10 in 2002?
11 A. Other children had been put ---
12 Q. Yes, the safe house, and there were other
13 children, put back in his house, little girls,
14 small kids.
15 A. I did not know that.
16 Q. Yes. That was done in 2002 ---
3 Q. (BY MR. DAVIS) As a person that deals
4 with people who have been molested, is that a
5 concern to you?
6 A. That it was a safe house?
7 Q. No, that REDACTED had children that the
8 church put in that house with him back at the same
9 time when REDACTED was being molested.
10 A. That would be a concern for me.
11 MR. DAVIS: Thank you.

In an abundance of caution, protected information is not provided in submission to Attorney Larry Crain's permanent injunction request granted on Sept 24, 2018.

MANN ACT FEDERAL CRIME COVER-UP ON-GOING

NASHVILLE POLICE SILENCED AUSTIN DAVIS IN JULY 2008. WAS A VICTIM FORCED TO LIE THAT THERE WAS NO COVER-UP AT COVENANT PRESBYTERIAN CHURCH?

INTERROGATORY NO. 25

Identify the date(s) when the Plaintiff first informed Jay and Natalie Hager about the Plaintiffs child-sex abuser.

RESPONSE: 2007.

2007

*Connected to
Tates Creek Presbyterian
Church in Lexington, Ky.*

INTERROGATORY NO. 26

Identify the date(s) when the Plaintiff first informed Teri Cavender about the Plaintiff's child-sex abuser.

RESPONSE: July of 2007.

2007

Identify the date(s) when the Plaintiff first informed school authorities and/or teachers at Nashville Christian School about the child sex abuse of the Plaintiff.

RESPONSE: July of 2007.

**In an abundance of caution,
protected information is not
provided in submission to
Attorney Larry Crain's
permanent injunction request
granted on Sept 24, 2018.**

VERIFICATION

**Sept 24, 2018 – Awarded a Default Victory
without a jury trial during a "Mann Act"
Federal crime cover-up (\$2.1 Million)**

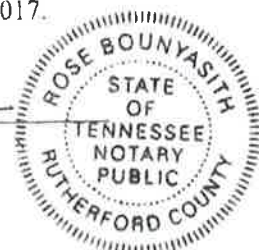
REDACTED

STATE OF TENNESSEE)
COUNTY OF WILLIAMSON)

Personally appeared before me, Rose Bounyasith, a notary public in and for said County and State, the above-signed, **REDACTED**, and did make oath that the information contained in the foregoing document was true and correct to the best of information, knowledge and belief.

Sworn to and subscribed before me this 31st day of July, 2017.

Rose Bounyasith
Notary Public



My commission expires: 1-24-21

Child sex abuse therapist, Caroline Post Cone, testified that Covenant Leadership knew as early as April 2008, about three months before Covenant Leaders used Nashville Police to silence and intimidate the Davis family. Covenant Leaders and Nashville Police falsely criminalized Austin Davis as a possible church shooter, while child-molester John Perry was provided a "safe sanctuary" at Covenant.

SESSION MEETING MINUTES
Covenant Presbyterian Church
33 Burton Hills Boulevard
—Nashville, Tennessee 37215—

A stated meeting of the Session was held Monday, July 14, 2008, 6:30 PM, at the church.

ELDERS PRESENT

Phil Schulz	Scott Troxel
Ron Kimery	Joe Eades
Joe Butler	Wade Hyatt
John Avery	David Hunsucker
Herb Kneeland	Wade McGregor
Jack Herndon	Dale Lewellen
Brad Southern	Don Bull
Mike Bishop	Pug Scoville
Tom Cox	

ELDERS ABSENT

Dewey Thomas	Jody Elder
Jack Wallace	

GUESTS PRESENT

Officer Tawana Chick—Metro Nashville Police Department
Deacons, Warrick Robinson

Moderator: Pastor: Jim Bachmann
Associate Pastor: Larry Ferris
Associate Pastor: Roy Carter
Assistant Pastor: Wayne Herring

Associate Pastor: Jack Foster
Visitor and New Members Director: Rick Arendale
Assistant Pastor: Matt Bradley

- I. Quorum present and meeting called to order.
Meeting opened with devotion and prayer.
- II. Combined meeting with the Deacons was conducted. Officer Chick, Joe Eades, Jim Bachmann and Warrick 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.
- III. M/S/P Approved the Session meeting minutes of April 6, April 23, April 30, May 5 and May 19, 2008.
 - A. M/S/P Accept John Perry's resignation from the Diaconate.
 - B. M/S/P Approved transfer of Daniel Larrison to Faith PCA, Wauchula, FL.
 - C. Elders are asked to consider serving in some role for the 2010 General Assembly to be hosted in Nashville.
M/S/P To request that the Covenant Presbyterian Session be part of serving communion at the 2010 General Assembly.
- IV. Old Business
 - A. M/S/P to receive new members:

Rob & Fronda Alley	Ritch Gillespie	Claire Sawyer
Reagan, Hayes	Christopher & Holly Ing	Britt Sellers
Mark & Anna Bright	Wes & Nancy Kennedy	Jason & Melissa Tillman
Onaly, David	Erin Malone	Dave & Doreen Turner
Will & Jaclyn Carney	David & Jane McCracken	Ted & Elizabeth Wade
Van & Cathy East	Parker & Kaylor	Wiley Walker
Frank & Kristy Frazier	Jason Puckett	
Bo & Happy Fulk	Bruce & Vickie Reed	

IV. Old Business, cont.

- B. Discussion concerning Austin Davis.
M/S/P Diaconate will be fully informed of the facts of the situation. A concise summary of the facts will be provided to elders and deacons. Members with questions about the situation will be referred to a church officer or pastor for information.
M/S/P No change in the security detail for the July 21st worship services.

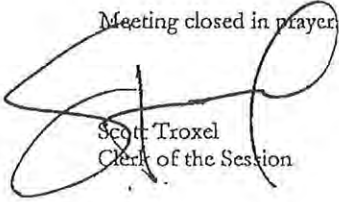
V. New Business

- A. M/S/P to accept the officer candidates as recommended by the Nominating Committee
B. Discussion concerning the monthly newsletter and its associated costs and staffing challenges.
M/S/P that the monthly newsletter will be published two more times. Members need to notify the Church office if they wish to continue to receive the monthly newsletter. In lieu of monthly mailings the newsletter will be accessible from the Covenant web-site.
C. M/S/P to approve of the WIC Bible Study Leaders
D. New Committees
E. M/S/P to approve housing allowances for Pastor Matt Bradley and Director of Music Paul Magyar,
F. M/S/P to form an ad hoc committee chaired by Herb Kneeland to work with the Diaconate to develop a comprehensive, long-term security plan.

VI. Adjournment

Next Stated Meeting—Monday, August 18, 2008

Meeting closed in prayer


Scott Troxel
Clerk of the Session

S. James Bachmann, Jr.
Senior Pastor