

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

**Willie Austin Davis**

Defendant/Appellant

vs.

**Case No.** M2019-01852-CCA-R3-CD

**Trial No.** 2017-A-62

**State of Tennessee**

Plaintiff/Appellee

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**AFFADAVIT OF WILLIE AUSTIN DAVIS**

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COMES NOW THE AFFIANT, WILLIE AUSTIN DAVIS, and being duly sworn, does hereby depose and say as follows:

I, Willie Austin Davis, swear and/or affirm that all of the facts stated in this motion are true and correct to the best of my knowledge.

1. I am an adult citizen, and resident of Nashville, Tennessee and do make this affidavit based on my own personal knowledge.
2. I am presently 65 years of age.
3. I personally cross-examined Clerk of Session Scott Troxel on Sept 11, 2017 during my criminal trial, and child sex abuse expert witness Caroline Cone during a deposition on Sept 11, 2018.
4. Since an active Mann Act Federal crime cover-up is still on-going before the Tennessee Court of Criminal Appeals, I am providing the Honorable Court the following: a) A written transcript of the Caroline Cone deposition taken at the office of Attorney Larry Crain on Sept 11, 2018; b) A video copy of the deposition of Caroline Cone which was also included in the Trial DVD's provided to DA Glenn Funk on Sept 27, 2018; c) A judicial letter from The Honorable Thomas W. Brothers to DA Glenn Funk written on Sept 27, 2018; d) A judicial order from The Honorable Kelvin D. Jones signed on March 14, 2016; e) The sworn interrogatories of **REDACTED**

**REDACTED**, aka **REDACTED**, signed on July 31, 2017. f) The conflict of interest information pertaining to Attorney General Herbert Slatery, Gov. Bill Haslam, Covenant Presbyterian Church, Christ Presbyterian Church, the Nashville Presbytery and the Presbyterian Church in America.

5. Attorney Larry Crain was the attorney for child-molester John Perry, and John Perry's child sex abuse victim, **REDACTED**, aka **REDACTED**. Attorney Larry Crain represented child-molester John Perry in a \$3 million Federal lawsuit against Rev. Billy Graham's publisher, HarperCollins Publishing: <https://www.tennessean.com/story/news/religion/2018/05/02/billy-graham-biography-franklin-graham-ghostwriter-harpercollins/574134002/>

Further affiant saith naught.

Willie Austin Davis  
Affiant

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

Personally appeared before me, EMELINE THRASH, a notary public in and for said County and State, the above-signed, Willie Austin Davis, Jr., and did make oath that the information contained in the foregoing document was true and correct to the best of her information, knowledge, and belief.

Sworn to and subscribed before me this 18<sup>TH</sup> day of SEPTEMBER, 20<sup>20</sup>.

Emeline Thrash  
Notary Public

My commission expires: 3/8/2020





State of TN  
vs.

Willie Austin Davis

M2019-01852-CCA-R3-CD

### Digital Files Enclosed

Company Name: AA - Deposition - Caroline Cone 9/11/2018

Contact: **REDACTED** vs Davis Trial Sept 24-26, 2018

Phone: \_\_\_\_\_ Date: \_\_\_\_\_

File Name: \_\_\_\_\_ Date Created: \_\_\_\_\_

Ex 1

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September 11, 2018

In an abundance of caution, protected information is **REDACTED** in submission to Attorney Larry Crain's limited injunction granted on 9/24/2018. First Amendment and Christian Church Attorney Larry Crain represents protected child-molester John Perry.

Child-Molester John Perry's Attorney - Larry Crain



Jay Sekulow - President Trump's Russian Colluion Lawyer

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Ex 1

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MIDDLE DIVISION SECTION AT NASHVILLE

**FILED**  
SEP 18 2020  
Clerk of the Appellate Courts  
Rec'd By \_\_\_\_\_

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Defendant/Appellant

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**State of Tennessee**  
Plaintiff/Appellee

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**APPELLANT REPLY**

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**Oral Argument Requested**

Willie Austin Davis - Citizen  
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Nashville, TN 37203  
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IN THE CRIMINAL APPEALS COURT FOR THE STATE OF TENNESSEE  
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**Willie Austin Davis**

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**APPELLANT REPLY**

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Comes now Appellant, Willie Austin Davis, to reply to the Appellee Response of Attorney General Herbert Slatery and General David Findley.

Appellant is grateful to The Honorable Andy D. Bennett, The Honorable Kelvin D. Jones, and The Honorable Thomas W. Brothers for writing a judicial opinion, a judicial order, and a judicial letter, which help to expose child-molester John Perry and protect children.

The Honorable Kelvin D. Jones exercised "*sua sponte*" authority in a related John Perry child sex abuse cover-up case, and Appellant prays the Honorable Court will exercise "*sua sponte*" or "*nostra sponte*" authority to reach the same conclusion as the Honorable Andy D. Bennett did in his minority opinion written about the same related child sex abuse cover-up case: "I believe Mr. Davis did not receive an impartial trial."

The Attorney General's Response is a stringent review of the Appellant's "*recusal*" issue about Judge Steve Dozier as described by the AG, however the Appellant's Issue was broader in scope to determine if the Appellant received a "*fair, impartial*" trial in accordance with the Tennessee Constitution, and the Tennessee Supreme Court's Conduct Rule 10B.

Contrary to the Attorney General's Response, the Appellant did not make a tactical decision to waive the "*recusal*" issue with Judge Steve Dozier during Federal Judge John Bryant's sworn testimony on the witness stand. For clarity, Appellant did not file a pre-trial recusal motion with Judge Steve Dozier because the Appellant did not know about Judge Dozier's campaign relationship and friendship with Worrick Robinson, or possess knowledge that Judge Dozier's uncle, Don Dozier (a former Nashville police officer), was a member of Covenant Presbyterian church. This information was not learned until after the damage was done and the sentencing hearing was completed on Sept 28, 2017.

During the trial and sentencing phase, Appellant did not know that Uncle Don and Aunt Chris Dozier were loyal Jim Bachmann cult followers who left Covenant to become charter members of Westminster Chapel (aka Stephens Valley Church) to begin a new start-up church cult at Julia Green Public School along with fellow charter cult member Kim Davis Mayo, sister of Dr. Andy Davis, principal of Julia Green public school, which is owned by the tax-paying voters and citizens of Davidson County via the Nashville Metro Government.

For clarity, Appellant has poor hearing and simply did not hear Judge Dozier's bench remark about his friendship with Federal Judge Bryant, and in previous court transcripts, Appellant complained to Judge Steve Dozier that his hearing is bad which is one of the reasons the Appellant desired to record his own hearings and trial as a falsely accused Defendant. However, Judge Steve Dozier was prejudiced against the Appellant and banned the Appellant-

Defendant from recording any of his court proceedings, and Judge Steve Dozier also ordered the Appellant's daughter to destroy her own recording of the Appellant's Voir Dire phase of the trial. Appellant's Brief – Pg 2, 8. TE Vol 8 – Pg 4. TE Vol 9 – Pg 3.

The Attorney General Response clearly demonstrates more institutional prejudice against an innocent Appellant and places the burden 100 % on the Appellant to establish all five "*plain error*" factors before an error may be recognized as plain by the Honorable Court. The Attorney General Response also defends imprisoned ex-Judge Casey Moreland who did not want the Appellant to be out of his control as a "*pro se*" Defendant so he appointed Attorney Lauren Wills to be the Appellant's attorney without any indigent paperwork being completed, and without Ms. Wills ever meeting with the Appellant at her office for a thorough review of all exculpatory evidence provided to Asst. DA Chandler Harris in discovery. TE Vol 7 – Pgs 1-6.

The Attorney General Response also defends Judge Cheryl Blackburn and her secret grand juror, Davidson County Sheriff Sgt. Solomon Holley, who initially arrested the Appellant at Covenant Presbyterian Church on Nov. 15, 2015, the day after Covenant Elder and Attorney Jack Bailey accused ex-Covenant Pastor Jim Bachmann of "*heinous sin*" in a Covenant Session meeting with 50-60 church members present at the meeting. Child-molester John Perry was also accused and convicted in a Covenant Church Court of "*heinous sin,*" and the Covenant Session voted 13-8 to relieve Pastor Jim Bachmann of his pastoral duties. TR Vol 2 – Pg 261-262

The Attorney General Response has no curiosity or care at all about the "*heinous sin*" of child-molester John Perry, or the accusation of "*heinous sin*" with fired PCA Pastor Jim Bachmann, or the information about secret grand juror Scottie Coombs (Harpeth Hall Alumnae Relations Director), or the information about secret grand juror Solomon Holley (Davidson County Sheriff Sergeant), or the information about secret grand jury foreman, Richard

Hillenbrand (retired career police sergeant and Steve McNair's grand jury foreman), which stands in stark contrast to the reaction of hundreds of readers of "The Silent Bell" web site which has information viewed almost 200,000 times. As a result of comments and encouragement received from "The Silent Bell" readers all across the country, a new podcast is in the early stages of planning and production. Appellant's Brief – Pg 10. <https://www.thesilentbell.org/>

With the discovery of judicial secrets only God Almighty Himself could expose, Appellant is extremely fortunate, blessed and protected by Almighty God to have learned about the unfair, prejudiced process which took place "under color of law" during the rigged indictment, malicious prosecution, and prejudiced trial of the innocent Appellant. Imprisoned ex-Judge Casey Moreland, Judge Steve Dozier, and Judge Cheryl Blackburn, were all disrespectful, rebellious and subversive to the authority of the Tennessee Constitution and the Tennessee Code of Judicial Conduct, and none of the judges were transparent, fair, or impartial as required by law with the innocent Appellant. (*Judge Cheryl Blackburn is now being sued in Federal Court by ex Public Defender Dawn Deaner for similar unconstitutional banning actions that were also taken against the unrepresented Appellant's wife and two children on behalf of Montgomery Bell Academy.*) TE Vol 14 – Pgs 32-34 TE Vol 12 – Pgs 1-3

The Attorney General Response effectively blames the Appellant for not filing "recusal" motions before he has learned concealed information, including corrupt grand jury information. The Attorney General Response wishes for the innocent Appellant to be further punished because he did not file motions before he learned about concealed information. The Attorney General Response is more interested in finding fault with the Appellant rather than being concerned about pursuing the corruption of grand juries and judges rather than pursuing "substantial justice" for the innocent Appellant. In regard to corrupt and rigged grand juries,



Judge Cheryl Blackburn pressed the Appellant with questions on how he learned about the secret grand jury proceedings in a court exchange on July 12, 2019. TE Vol 14 – Pgs 34-35

Q. You said that you only discovered this recently, this grand jury report. How did you, actually find this grand jury report? Where did you get it?

A. I listened to the Tim Rohan, Sports Illustrated podcast on the murder of Steve McNair.

Q. No. My question is a simple one. How did you obtain it and how did you become aware of it? Did you go online and print it out?

A. Yes. I became concerned about the whole thing—

Judge Cheryl Blackburn did not allow the Appellant to freely answer her question because she did not wish for the Appellant to freely talk about Tim Rohan’s excellent “*Fall of a Titan*” podcast, or the fact that imprisoned ex-Judge Casey Moreland was contacted twice by Mr. Wayne Neely after Steve McNair and Sahel Kazemi’s bodies were found, or that former retired Nashville Police Sgt. Richard Hillenbrand was the grand jury foreman when a request for the murder investigation of Steve McNair by ex-Metro Police Officer Vincent Hill was denied, and the grand jury report was mysteriously unsigned by any of the secret grand jurors.  
<https://www.thesilentbell.org/>

As expected, the Attorney General Response effectively blames and holds the Appellant responsible for everything done corrupt and wrong by Government Officials, but the Appellant strongly disagrees with the Attorney General’s Response and Appellant believes Tennessee Government has the burden 100% to provide each and every individual American citizen a “*fair, impartial*” trial, and a “*fair, impartial*” indictment and prosecution, since the “*indictment-*

*prosecution*” process is the bedrock foundation of any American trial, and is cited to the jury as a part of the trial.

The Attorney General’s Office has access to the same Appellate Record in this case as the Appellant, and the Appellant is certain the Attorney General’s Office is able to read and comprehend the serious criminal information provided in the Appellate Record and the Appellant’s brief, just as Speaker Beth Harwell’s Special Counsel Doug Himes was also able to comprehend the serious criminal information provided to Speaker Beth Harwell in 2013: “You make very serious allegations of a criminal nature.” 6 Exhibits – Jury Trial Exhibits – Exhibit 6.

Sadly, the Attorney General’s Office is now turning a blind eye to a bogus, corrupt “*trespass*” trial and rigged conviction that is shrewdly being used to conceal a real “*child sex abuse*” crime under “*color of law*” in Judge Steve Dozier’s courtroom. For example, in the Appellant’s 1<sup>st</sup> arraignment hearing on Aug 24, 2016, the Appellant clearly and truthfully told Judge Steve Dozier that a child-molestation cover-up crime was taking place in his criminal courtroom, but Judge Steve Dozier ignored the Appellant’s concerns and did not care about the use of his criminal courtroom “*under color of law*” to protect a Mann Act Federal crime cover-up and child-molester John Perry. TE Vol 6 – Pg 3.

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

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

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

The Court: This is a criminal trespass case.

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

The Court: Excuse me? Do What?

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

The Court: Okay. Where do you live.

Thirteen months after the initial arraignment on Sept 6, 2017, Judge Steve Dozier still did not care about the use of his criminal courtroom "*under color of law*" to protect a Mann Act Federal crime cover-up and child-molester John Perry. TE Vol 9 – Pg 11.

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

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

During the Appellant's final pre-trial hearing on Sept 6, 2017, Judge Steve Dozier banned the Appellant from mentioning the child sex abuse cover-up during the trial. TE Vol 9 – Pg 5. TR Vol 2 – 269-270.

Mr. Davis: Every motion they brought up in here is part of the child sex abuse cover-up. This is a prosecutor over here--

The Court: I haven't gotten to every other motion. I—

Mr. Davis: Every motion he's got. The whole thing has been covered up right here in this court.

Prosecutor S. Chandler Harris was unashamed in his "*white knight*" mocking of the Appellant during the two-day trial, and Mr. Harris has now fled the state of Tennessee to work for Mullen Coughlin Law Firm in the Philadelphia, PA area. Judge Steve Dozier pretended to be friendly and fair to the Appellant in front of a trusting jury, but Judge Steve Dozier was ultimately forced to permit the Appellant to ask significant questions about the child sex abuse

cover-up after a tactical blunder was made with DA witness Scott Troxel by Asst. DA Chandler Harris. Judge Steve Dozier and Asst. DA Chandler Harris did not wish for the jury to hear any information about child-molester John Perry, the child sex abuse cover-up, or the precise time when a member of the Covenant Session learned about John Perry's child sex abuse, and the jury wasn't allowed to consider the child sex abuse cover-up information as they were narrowly focused on a bogus, unauthorized "*trespass*" charge as a distraction.

To help the Honorable Court to better understand a real child sex abuse crime that was concealed by a "*malicious indictment and prosecution*" and a bogus "*trespass*" trial before Judge Steve Dozier, a fact-based timeline of "*who, what, when, where and why*" is below:

1. 2000 – 2002: Covenant Deacon John Perry repeatedly molested at least one 11-year old child, **REDACTED**, aka **REDACTED**, in multiple states. Exhibit 1 Pgs 24-25. TR Vol 1 – Pgs 69-70. TR Vol 2 - Pg 184. TR Vol 2 – Pgs 177-178. Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 – Pgs 49-51. Exhibit 5 – Motion For New Trial – 3 of 4 – Vol 1 – Pgs 195 – 198. Exhibit 5 – Motion For New Trial – 3 of 4 Transcript of Trial Vol 1 - Pgs 29 – 33.
2. 2002 – 2004: Covenant Leadership put Greg Lurie's young children in John Perry's "*safe house.*" Attorney Worrick Robinson represented Covenant Church staff member, Mrs. Greg Lurie, in a divorce case before Judge Muriel Robinson. TR Vol 1 – 69-70. TR Vol 2 – Pgs 169 – 178.
3. 2002 – 2006 – Covenant Deacon Austin Davis asked questions about the safety of children placed in John Perry's "*safe house.*" TR Vol 1 – Pg 63-64, 66-68. Exhibit 5 – Motion For New Trial – 3 of 4 – Vol 1 – Pgs 195 – 198.

4. 2006 (July 27) – Covenant Deacon Austin Davis resigned from Covenant Leadership after the Covenant Session denied his request for a congregation meeting. Austin Davis wrote in his letter: “Would a molester or child abuser be a concern and a reason to call such a meeting?” TR Vol 1 – Pg 51 – Discovery and Other Links – 1. Documents <https://www.keepandshare.com/doc4/show.php?i=2545072&cat=0&all=y> (The documents link above was removed from public view in submission to Attorney Larry Crain’s injunction granted on Sept 24, 2018. Attorney Larry Crain represents child-molester John Perry and John Perry’s victim **REDACTED**, aka **REDACTED**.) Exhibit 2 – Pg 5.
5. 2007 (March) – After five years, Greg Lurie finally wrote child-molester John Perry a letter about the damage done to his family and children. TR Vol 1 – Pgs 66-67.
6. 2007 – **REDACTED**, aka **REDACTED**, turned 18 and broke **REDACTED** silence to inform Covenant Youth Pastor J Hager, Covenant Member Teri Cavender, Nashville Christian School authorities, and others that John Perry sexually molested **REDACTED**. Exhibit 3 – Pgs 15-16. - TR Vol 1 – Discovery and Other Links Pg 51 - 8. Wade Burleson - <https://www.wadeburleson.org/2015/06/child-abuse-statute-of-limitations-and.html>
7. 2008 (April) – No one at Covenant or elsewhere reported child-molester John Perry to DCS or Nashville Police. Nine months later, Covenant Associate Pastor and Session Member Larry Ferris made contact with child sex abuse therapist, Caroline Cone, for emergency child sex abuse counseling with child-molester John Perry’s victim, **REDACTED**, aka **REDACTED**. Exhibit 1 – Pg 22.

8. 2008 (April) - Covenant Leadership made a deal with child-molester John Perry. Catherine Davis provided sworn testimony about the “*Covenant-John Perry*” child sex abuse cover-up deal: “And so anyway, they let John Perry stay there. They let him quietly resign. **REDACTED** said they made a deal with them, you resign, we don’t say anything, won’t report you, won’t do anything.” Exhibit 5 – Motion For New Trial – 3 of 4 Transcript of Trial Vol 1 Pg 198. Exhibit 5 – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 – Pgs 49-51
9. 2008 (May) – Austin Davis did not know John Perry was a child-molester, but Austin Davis did inform approximately 75 Covenant Members that Worrick Robinson’s blood-kin relative, Judge Muriel Robinson, jailed Greg Lurie for 80 days. TR Vol 1 – Pg 68
10. 2008 (June 27) – Three months after Covenant Session Member Larry Ferris informed child sex abuse therapist, Caroline Cone, about John Perry’s child sex abuse, Covenant Clerk of Session Scott Troxel-- with the legal counsel of Worrick Robinson-- took aggressive unapproved unilateral action to cover-up the John Perry child sex abuse scandal by mailing an unauthorized “*trespass*” letter to the Appellant. Tragically, in the new era of Netflix “*Cuties*” and increasing social acceptance of pedophilia as a new normal, Attorney General Herbert Slatery’s Office is now protecting this aggressive unapproved unilateral action by Scott Troxel by playing fast and loose with the perjured testimony of Scott Troxel. For clarity, a congregation “*vote*” once a year to elect church officers does not constitute a property decision vote of significant importance which must have a called meeting “*vote*” and the consent of the joint property owners and the approval of the Session per the PCA

Governing Rules. As a former PCA Elder, Attorney General Herbert Slatery should be familiar with the PCA governing by-laws and deacon stewardship responsibilities. Vol II Ex 5, at 45. Appellee Response Pgs 19-20 – Appellant’s Sworn Testimony. TR Vol 2 – Pg 221.

11. 2008 (June) - The Covenant Session Board Minutes provided to the Appellant by Covenant Member Rick Jacques clearly reveal the Attorney General’s Response is wrong and that Scott Troxel committed perjury because the Covenant Session did not meet in June 2008 when the June 27<sup>th</sup> fake “*trespass*” letter was written; did not vote on the significant property matter as required by the governing PCA by-laws; did not inform the 2000 joint property owners about the illegal ban as required by the governing PCA by-laws; did not inform the Covenant Diaconate about the illegal ban as required by the PCA governing by-laws; and the Covenant Session did not authorize Scott Troxel to write the counterfeit “*trespass*” letter. As a result of Scott Troxel hijacking the Covenant Property without the consent of anyone but himself, 2017 Greater Nashville Real Estate President, Scott Troxel, tragically violated the law to deliberately commit perjury to convict the innocent Appellant to protect child-molester John Perry. TR Vol 1 – Pg 71 - 85 Exhibit 5 – Motion For New Trial – 3 of 4 Transcript of Trial Vol 1 Pgs 27 – 29. TR Vol 2 – Pg 221.
12. 2008 (June 29) – Three months after the “*Covenant-John Perry*” child sex abuse cover-up deal, Attorney Worrick Robinson and a secret armed unit of more than 2 men laid in wait to assault the Appellant and his family, including two minor children, in broad daylight at the front door of a public Sunday church service in violation of: 1) Article 1 Section 3 of the Tennessee Constitution: “That all men have

a natural and indefeasible right to worship Almighty God according to the dictates of their own conscience; that no man can of right be compelled to attend, erect or support any place of worship , or to maintain any minister against his consent; that no human authority can, in any case whatsoever, control or interfere with the rights of conscience; and that no preference shall ever be given, by law, to any religious establishment or mode of worship.” 2) The Presbyterian Book of Church Order Chapter 49:4. “All who attend public worship are expected to be present in a spirit of reverence and godly fear, forbearing to engage in any conduct unbecoming to the place and occasion.” TR Vol 2 – Pgs 169 – 178. TR Vol 2 – Pg 220

13. 2008 (July 2) – Three months after the “*Covenant-John Perry*” child sex abuse cover-up deal, Nashville Police Sgt. Twana Chick and Detective Tim Codling made a 2-hr nighttime visit to the private property of Appellant Austin Davis to silence him from asking questions about the safety of children placed in John Perry’s “*safe house*.” Attorney Worrick Robinson provided a false statement to Sgt. Chick: “I spoke w/ Worrick Robinson who witnessed the trespass.” After the intimidation by Nashville Police, Appellant Austin Davis was unable to obtain any type of police report for five months from the Nashville Police Department, and the OPA letter and Sgt. Chick’s report was released to the Appellant five days after the murder of Tennessee Titan Quarterback Steve McNair which occurred on July 4, 2009. TR Vol 1 – Pg 109-112. TR Vol 2 – Pgs 174. TR Vol 2 – Pgs 169 – 178. TR Vol 1 – Pgs 87-88.
14. 2008 (July 6) – During the same week the Nashville Police were threatening and socially isolating the Davis Family, Covenant Youth Leader Betsie Carlson invited



the Appellant's 13-year old minor daughter back to Covenant with the approval of Covenant Sr. Pastor Jim Bachmann. This invitation clearly indicated the "*trespass*" letter was a fake, and the phoney "*invitation*" was a vicious trap with a 13-year old girl used as worm bait. Unknown armed men and Nashville Police were present at the non-profit Covenant church property to target, follow, bully, intimidate, humiliate, and to frighten a 13-year old girl to protect child-molester John Perry. TR Vol 1 – 89-90. TR Vol 2 – 179 -185. TR Vol 2 - 186-187. TR Vol 2 – 195-197.

15. 2008 (July 14) – Eight days after the 13-year old minor daughter was used as "*worm bait*" for a trespass trap to ensnare Austin Davis for arrest, Nashville Police Sgt. Twana Chick, Worrick Robinson, Jim Bachmann and Joe Eades provided a false, defamatory security briefing to Covenant Elders and Deacons about Appellant Austin Davis being a possible crazy "*church shooter.*" Child-molester John Perry was allowed to quietly resign from the Covenant Diaconate without any Covenant Leader reporting John Perry to Nashville Police. TR Vol 1 – Pgs 84-85

16. 2009 (Feb) – Ten months after the "*Covenant-John Perry*" child sex abuse cover-up deal, child-molester John Perry effectively "*returned to the scene of the crime*" to write the Appellant's mother-in-law, Nancy Fleming, an intriguing letter on Feb 12, 2009: "I know nothing whatsoever about re-instatement meetings or armed guards." It is interesting that child-molester John Perry ignored the mention of "*two metro detectives*" in Nancy's letter and did not deny that he knew about the use of Nashville Police on the Appellant's family following a hurriedly called meeting with John Perry, Susan Ann Perry, and **REDACTED** (aka **REDACTED**) with an attorney and Covenant Leaders to discuss child-molester John Perry and The Covenant School on

or about June 30, 2008, which was the day **REDACTED** (aka **REDACTED**), returned from a trip to Ghana with Peter Rosenberger and his family. Vol 1 - Pg 89-91. TR Vol 2 – Pg 178

17. 2009 (Feb 9) - Child-molester John Perry proceeded with the child sex abuse cover-up as agreed upon with Covenant Leadership without telling Nancy Fleming what Scott Troxel and Covenant Leaders already knew about John Perry's child sex abuse in 2007 and early 2008. The concealment of a crime is also a crime, but Nashville Police are totally committed to child sex abuse cover-up along with child-molester John Perry, Scott Troxel and Covenant Presbyterian Church Leadership, so a "*perfect*" crime cover-up was established with the assistance of Nashville Police Leadership, and is still on-going.
18. 2009 (March) – 2012 - Attorney Worrick Robinson represented Mrs. John Perry in her divorce from child-molester John Perry before Judge Carol Soloman. Judge Carol Soloman did not recuse from any of the 3 lawsuits filed by the Appellant's family beginning in June 2013 even though Judge Carol Soloman knew all about John Perry's child sex abuse and did not report him to Nashville Police. Judge Carol Soloman demolished all three child sex abuse cover-up lawsuits filed by the Appellant's family, including the first lawsuit which included Attorney Worrick Robinson as a defendant. New Federal Judge William "Chip" Campbell, Jr., Covenant Member and ex-Board Chairman of The Covenant School, represented Defendant Nashville Presbytery in two of the lawsuits. TR Vol 1 92 – 97.
19. 2009 (Aug 11) – Austin Davis reported possible crimes committed against his family at Covenant Presbyterian Church to Nashville Police Chief Ronal Serpas. Austin

Davis did not know about the “*Covenant-John Perry*” child sex abuse cover-up deal at this time, or that Nashville Police were joined in the effort to protect John Perry and a Mann Act Federal crime cover-up. TR Vol. 1 – Pgs 98 - 112

20. 2010 (June 6) – Two years and three months after the “*Covenant-John Perry*” child sex abuse cover-up deal, Covenant Leaders mysteriously betrayed child-molester John Perry and the secret child sex abuse cover-up deal to publicly excommunicate John Perry for “*heinous sins.*” On Nov 14, 2015, the day before Appellant Austin Davis was falsely arrested by secret grand juror Sgt. Solomon Holley and MNPD Officer John Daughtery, Covenant Elder and Attorney Jack Bailey accused Pastor Jim Bachmann of “*heinous sins.*” Covenant Sr. Pastor Jim Bachmann was fired by the 2000 Covenant Congregation members and joint property owners after a raucus four-hour discussion and vote on Oct 2, 2016. 6 Exhibits – Jury Trial Exhibits – Exhibits 3-4 - TR Vol 2 – Pg 177 TR Vol 2 – 262. TR Vol 1 – Pg 51 – Discovery and Other Links – 1. Documents <https://www.keepandshare.com/doc4/show.php?i=2545072&cat=0&all=y> - Exhibit 4 (The documents link above was removed from public view in submission to Attorney Larry Crain’s injunction granted on Sept 24, 2018. Attorney Larry Crain represents child-molester John Perry and John Perry’s victim **REDACTED**, aka **REDACTED**.)
21. 2012 (Aug 22) - After **REDACTED**, aka **REDACTED**, informed Austin Davis about John Perry’s child sex abuse cover-up deal, Austin Davis reported John Perry’s child sex abuse to Gov. Bill Haslam and DCS. Gov. Bill Haslam is a long-time friend and prayer group partner with Attorney General Herbert Slatery. TR Vol 1 – Pg 50.

22. 2012 (Oct) – After **REDACTED**, aka **REDACTED**, informed Austin Davis about John Perry’s child sex abuse, Austin Davis reported John Perry’s child sex abuse to Commander Marlene Pardue and Sgt. Twana Chick. TR Vol 1 – Pg 51 Flash Drive Audio Recordings – *A Davis reported child sex abuse to Sgt. Twana Chick and Commander Marlene Pardue* – TR Vol 2 – Pg 243.
23. 2012 (Oct 22) – **REDACTED**, aka **REDACTED**, and child sex abuse therapist Caroline Cone, met with Nashville Police Detective Chuck Fleming for several hours to discuss every detail of the **REDACTED’s** child sex abuse, which included child sex abuse across state lines in violation of the Federal Mann Act which has no statute of limitations for child sex abuse. **REDACTED**, aka **REDACTED**, was told the statute of limitations expired at 18, and Nashville Police told Austin and Catherine Davis the statute of limitations expired at 19. The statute of limitations did not expire until at least 21 years of age, and the statute of limitations is still running because Nashville Police covered up a child sex abuse crime. There is no statute of limitations for child sex abuse across state lines under the Federal Mann Act. Exhibit 1 – Pgs 10-12, 34-35. Discovery and Other Links – 8. Wade Burleson - <https://www.wadeburleson.org/2015/06/child-abuse-statute-of-limitations-and.html>
24. 2013 (Feb 4) - After Austin Davis reported the “*Covenant-John Perry*” child sex abuse cover-up to Covenant Member and Speaker Beth Harwell, Speaker Harwell’s Special Counsel, Doug Himes wrote Austin Davis a letter: “I have reviewed all of the information provided by you to Speaker Harwell’s Office. You make very serious allegations of a criminal nature.” 6 Exhibits – Jury Trial Exhibits – Exhibit 6.

25. 2013 – Shortly after Speaker Harwell’s Special Counsel Doug Himes told Austin Davis he had confidence in the Nashville Police Department and the DA’s Office to handle the child sex abuse criminal allegations, the Nashville Police deliberately lied to 2000 Covenant members, including Speaker Beth Harwell, about John Perry’s child sex abuse: “There is nothing to these claims.” Nashville Police gave a “*greenlight*” to Covenant Members to threaten, harass and defame the Appellant’s family. This intimidation effort continues with three creepy photographs sent to the Appellant in recent days from the email account of a current or former Covenant Member Derek Blank. Exhibit 5 - TR Vol 1 – Pg 51 – Flash Drive Audio Recordings - # 6 Elizabeth Parks – Police Said Nothing To The Claims. –

<https://soundcloud.com/valglenn18/citing-police-covenant-meeting-nothing-to-these-claims>

26. 2014 (Sept) – Two years after Austin Davis reported John Perry’s child sex abuse to Gov. Bill Haslam and DCS, Attorney General Herbert Slatery ignored the desperate plea letter written by the Appellant’s wife, Catherine Davis, which was hand-delivered to the Governor’s Office at the State Capitol on Sept 19, 2014. Exhibit 6 TR Vol 2 – 205 – 212.

27. 2015 (June) – **REDACTED**, aka **REDACTED**, told BuzzFeed News that **REDACTED** believed that Covenant Presbyterian Church reacted appropriately, and did not cover up John Perry’s alleged offense. TR Vol 1 – Discovery and Other Links – 9. BuzzFeed – <https://www.buzzfeednews.com/article/andrewkaczynski/co-author-of-mike-huckabee-books-was-accused-of-child-molest>

28. 2015 (June) – Nashville Police lied to BuzzFeed News that the statute of limitations expired and John Perry could not be prosecuted. However, the “*Covenant-John*

*Perry*” child sex abuse cover-up deal concealed a child sex abuse crime and extended the statute of limitations in the state of Tennessee. There is no statute of limitations for child sex abuse across state lines under the Federal Mann Act. TR Vol 1 – Pg 51 - Discovery and Other Links – 8. Wade Burleson -

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

29. 2015 (June) – John Perry gave an artfully crafted and deceptive global public statement to the London Daily Mail: “Thank you for getting in touch. I haven’t read the article but I heard about it. I don’t have anything to say for the record, but will tell you that the person behind it has been pursuing a vendetta against his former church for years and this story is one of the means he has used. Having failed there, he has evidently turned his attention to elsewhere. I will also tell you that whatever private difficulties there may have been, the parties involved were reconciled and restored years ago, for which I thank God every day.” TR Vol 1 – Pg 51 – Discovery and Other Links – 9. BuzzFeed

<https://www.buzzfeednews.com/article/andrewkaczynski/co-author-of-mike-huckabee-books-was-accused-of-child-molest>

30. 2016 (Feb-Mar) – **REDACTED**, aka **REDACTED**, represented by Attorney Larry Crain, filed a \$3 million “*invasion of privacy – defamation*” lawsuit against Austin Davis. John Perry believes that child sex abuse is a “*private difficulty*,” and Attorney Larry Crain argued that child sex abuse is a “*private matter*.” Case # - M2018 – 02001 – COA – R3 – CV.

31. 2020 (Feb) – The Tennessee Supreme Court protected child-molester John Perry by granting John Perry’s child sex abuse victim, **REDACTED**, aka **REDACTED**, a

\$2.1 million “*default*” victory against the Appellant. Case # - M2018 – 02001 – SC – R11 - CV

Attorney General Herbert Slatery and General David Findley fully support the conduct of the Tennessee Supreme Court, imprisoned ex-Judge Casey Moreland, Judge Steve Dozier, Judge Cheryl Blackburn and the Appellant’s rigged conviction, even though Judge Steve Dozier’s court reporter, Shana Crawford, did not properly sign, certify and attach the court reporter’s official certificate to the voir dire and trial transcripts, and Ms. Crawford apparently did not promptly file the transcripts as part of the court records in compliance with Tennessee Code Annotated 40-14-307. Also, it took almost two years to obtain the requested transcripts, and the voir dire transcript was not obtained until after the final July 12, 2019 hearing before Judge Cheryl Blackburn.

As Appellant writes this reply, the voir dire and trial transcripts remain disputed as inaccurate and missing important dialogue. The Appellant’s transcripts within the Appellate Record are now before the Tennessee Court of Criminal Appeals even though no one-- court reporter Shana Crawford, prosecutor Chandler Harris, pro Se Appellant Austin Davis, or the trial judge Steve Dozier or his replacement Cheryl Blackburn-- has signed the voir dire and trial transcripts as accurate, complete and true.

Appellant contends this glaring lack of integrity with the critical trial transcript records is additional evidence of the “*true child sex abuse cover-up crime*” which took place in Judge Steve Dozier’s courtroom on Sept 11-12, 2007.

Appellant is also concerned that Attorney General Herbert Slatery’s Office is defending DA Glenn Funk’s malicious indictment, prosecution and trial of the Appellant. On Sept 8, 2014, AG Candidate Herbert Slatery sat behind the Appellant as he provided information to the

Tennessee Supreme Court about John Perry's child sex abuse cover-up. On Sept 19, 2014, Appellant's wife, Catherine Davis, hand-delivered a desperate letter to the Governor's Office for Attorney General Herbert Slatery. To date, six years later, Attorney General Herbert Slatery has ignored the desperate plea of a bullied, banned and threatened mother. Exhibit 6

Attorney General Herbert Slatery is a long-time friend of Gov. Bill Haslam who attends Christ Presbyterian Church and was informed about John Perry's child sex abuse in August 2012. TR Vol 1 – Pg 50

It is possible that Attorney General Herbert Slatery also attends Christ Presbyterian Church since he and Gov. Bill Haslam are long-time friends and were elders together at Cedar Springs Presbyterian Church in Knoxville. Per Mr. Slatery's Attorney General Candidate Application, Mr. Slatery has been an elder for 30 years and at one time was most likely an elder in the Presbyterian Church in America prior to Cedar Springs leaving the PCA denomination around 2000. It is also possible that both Attorney General Herbert Slatery and Gov. Bill Haslam are both friends with Rev. Tullian Tchividjian, grandson of Rev. Billy Graham, who also served on the staff of Cedar Springs Presbyterian Church around 2000. Rev. Tullian Tchividjian's brother, Boz Tchividjian, was a member of the PCA committee that wrote the 2014 PCA child sex abuse proposal after the Appellant's Family filed their 1<sup>st</sup> child sex abuse cover-up lawsuit against the PCA in June 2013. The Tchividjian brothers uncle, Rev. Franklin Graham, wrote a Rev. Billy Graham biography with ghostwriter John Perry prior to the firing of child-molester John Perry in the summer of 2007.

Child-molester John Perry is well connected to both Christ Presbyterian Church and Covenant Presbyterian Church, who are very powerful sister churches in the city of Nashville. Former House Speaker Beth Harwell is a current or former member of Covenant Presbyterian



Church, and U. S. Senator Marsha Blackburn is also a member of Christ Presbyterian Church where the Appellant was once a member in the 1980's prior to becoming a member at Covenant Presbyterian Church around 1992. Attorney General Herbert Slatery is apparently friends with Christ Presbyterian Church Sr. Pastor Scott Sauls and Christ Presbyterian Elder Gif Thornton, and many other people within the Presbyterian Church in America, including Covenant Pastor Billy Barnes. Additionally, Gov. Bill Lee is a Christ Presbyterian Academy Alumni Father, along with other Christ Presbyterian Academy Alumni Parents which include: 1) DA Star prosecution witness Scott Troxel, who committed perjury; 2) Child sex abuse therapist expert witness Caroline Cone; 3) And protected child-molester John Perry.

On Sept 20, 2019, Attorney General Herbert Slatery's Office posted this public statement on Sept 20, 2019: "The Office of the Attorney General has the obligation to defend the rule of law and to ensure that the process is fair and transparent, especially when it relates to criminal matters that affect the rights of innocent victims, the accused and the public. 'The public has a special trust in this Office to help preserve the integrity of the criminal justice system,' said General Slatery.

The Attorney General's Response clearly reveals that the AG's Office fully supports the John Perry-Covenant-PCA-Police child sex abuse cover-up which undermines the integrity of the criminal justice system. Appellant is not a trained attorney, but Attorney General Slatery's Chief Prosecutor role in the State of Tennessee and the personal conflict of interest Attorney General Slatery has with Gov. Bill Haslam, Gov. Bill Lee, Sen. Marsha Blackburn, Gif Thornton, Pastor Billy Barnes, and so many friends within the Presbyterian Church in America, would cause a reasonable mind to question if it was legally ethical for the Tennessee Attorney

General's Office to be permitted to defend a "*malicious indictment, prosecution and trial*" of the Appellant.

The Attorney General's Response is a well crafted, misleading document which does not seek "*substantial justice*" and is extremely prejudiced against the Appellant, and which should possibly be disqualified by the Honorable Court to prevent further punishment and injury to the innocent Appellant, and to the integrity of the Tennessee Judicial System.

A few other related public scandals are also undermining public trust in the integrity of the Tennessee Justice System, the Nashville Police Department, and the Nashville Mayor's Office. 1) The FBI arrest and Federal conviction of imprisoned ex-Judge Casey Moreland; 2) The new Federal Lawsuit filed by former public defender Dawn Deaner against Judge Cheryl Blackburn for the violation of Ms. Deaner's Constitutional rights; 3) The sexual harassment, assault, rape and racist allegations made by current and former police officers within the Nashville Police Department; 4) The Nashville Mayor's Office Covid-19 email cover-up effort reported by Fox 17 news reporter Dennis Ferrier.

The Attorney General Response is disappointing because it supports the grotesque and obvious misconduct of the Nashville Police Department, ex-Judge Casey Moreland, Judge Steve Dozier, Judge Cheryl Blackburn, and three contaminated grand juries identified by the Appellant in the Appellant's brief, including the grand jury of murdered Tennessee Titans Quarterback Steve McNair. TR Vol 4 – Pgs 429 – 432. TR Vol 4 – Pgs 465 – 468.

The Attorney General's Office apparently supports rigged grand juries, Judge Steve Dozier, ex-police officer Don Dozier, and the derogatory use of "*Martin Lucifer*" to describe Dr. Martin Luther King, Jr, plus the three-year unlawful banning of the Appellant's family from the Julia Green Public School and Public Park, with the support of Dickinson Wright Law Firm,

Nashville Police, Mayor John Cooper, the Metro Council, and the Nashville School Board. Appellee Response Appendix. TR Vol 3 – Pg 349.

The Attorney General Response perceived no prejudice or deceit by Judge Steve Dozier against the Appellant, and yet Judge Steve Dozier banned the Appellant from saying “*Bull Connor*” in the courtroom during the trial. As mentioned above, Judge Steve Dozier also took an extra step of banning the Appellant from Julia Green Public School where his Uncle Don and Aunt Chris Dozier were charter church members of Westminster Chapel after leaving Covenant Presbyterian Church to loyally follow fired Covenant Pastor Jim Bachmann. TR Vol 2 – 271 TR Vol 3 – Pg 312

Westminster Chapel and Julia Green Public School were not part of the Covenant Presbyterian Church trespass issue, but Judge Steve Dozier still banned Austin Davis from his Uncle Don Dozier’s new church at Julia Green Public School even though Judge Steve Dozier artfully wrote in his recusal order: “At or before trial, the Court had no information regarding the church membership of an uncle.” TR Vol 4 – Pgs 434-435.

On Aug 6, 2020, the day before the Appellant filed his brief to complain again about the Judge Steve Dozier’s protection of the Nashville Police Department and the lack of integrity with Nashville Police Chief Steve Anderson, the Appellant learned from a “*Silent No Longer*” press conference that Nashville Police Officers also complained of being bullied and intimidated within the “*bully-thug*” culture of the Nashville Police Department.

Former sex crime detective, Ms. Greta McClain and her “*Silent No Longer*” organization, along with 19 current and former female police officers, were brave to step forward with allegations of sexual harassment, assault, rape and racism within the toxic culture of the Nashville Police Department. Ms. McClain’s report also includes internal disturbing allegations

that police have sexually harassed or assaulted female police officers and citizens, or that an underage girl was possibly raped in a Florida hotel room by Nashville Police Officers, or that Nashville Police protected another child-molester, Nashville Catholic priest Edward McKeown, just as Nashville Police have protected child-molester John Perry for the past 12 years

As the father of a banned, bullied and molested former Harpeth Hall girl student, Appellant was not surprised to read the 68-page "*Silent No Longer*" public statement because the Appellant and his family have been unlawfully banned, bullied, threatened and intimidated with perpetuity since June 29, 2008-- all to protect child-molester John Perry.

Appellant was also not surprised to learn that Mayor John Cooper, Police Chief Steve Anderson, Director Kathy Morante, Commander Marlene Pardue, and Commander Preston Brandimore are all included in the "*Silent No Longer*" press release. and that all are also involved in a John Perry child sex abuse cover-up which is still on-going before the Tennessee Court of Criminal Appeals.

In closing, Appellant is aware that the Tennessee Court of Criminal Appeals found a legal way to overturn the conviction of man who took close-up photographic images of three women's "*private areas*" in May 2020. The USA Today Headline stated: Tennessee Appeals Judges Says It's Ok To Make Creepy Videos Of Women Without Their Consent. Appellant prays the Honorable Court will give fair and equal consideration to the innocent Appellant who followed the mandatory reporting laws to report child-molester John Perry for the protection of vulnerable children in Nashville, and beyond. Appellant prays the Honorable Court will exercise "*sua sponte*" or "*nostra sponte*" authority to overturn the conviction of the innocent Appellant, a former youth coach and child-molester whistleblower, who did his very best to protect

vulnerable children from child-molester John Perry, and any other protected child-molesters who are hiding within the Presbyterian Church in America, and elsewhere.

Respectfully Submitted,



Willie Austin Davis - Citizen  
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**CERTIFICATE OF SERVICE**

I, Willie Austin Davis, hereby certify that a true and exact copy of the foregoing motion has been forwarded by United States Postal Service, first class, postage pre-paid, on Sept 18, 2020, to the following parties:

Attorney General Herbert Slatery  
General David Findley  
Office of the Tennessee  
Attorney General  
301 6<sup>th</sup> Ave. North  
Nashville, TN 37243



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