

**COPY**

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

Willie Austin Davis  
Defendant/Appellant

<b>FILED</b>
OCT 09 2020
Clerk of the Appellate Courts Rec'd By _____

vs.

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

State of Tennessee  
Plaintiff/Appellee

*In an abundance of caution, protected information is REDACTED in submission to Attorney Larry Crain's limited injunction granted on 9/24/2018. Attorney Larry Crain represents child-molester John Perry, and John Perry's child sex abuse Victim #1.*

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**4<sup>th</sup> MOTION TO CONSIDER POST-JUDGMENT FACTS**

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1. Pursuant to Tennessee Rule of Appellate Procedure 14(a), Appellant moves the Court to consider the facts hereinafter set forth. For grounds, Appellant states these facts occurred after the judgment herein appealed.
2. Appellant is providing the Honorable Court a superior copy of the sworn deposition transcript of child sex abuse therapist, Caroline Cone, which occurred at the office of Larry Crain on Sept 11, 2018, a year after the Appellant's trial occurred on Sept 11-12, 2017.  
Exhibit i
3. Appellant was provided the superior transcript copy on Oct 6, 2020, by the Appellate Court staff when the Appellant filed 2<sup>nd</sup> and 3<sup>rd</sup> Motions to Consider Post-Judgment Facts with the Tennessee Court of Criminal Appeals. The superior transcript copy was included in an Appellate Box record set for destruction in a related child sex abuse cover-up case, but

Appellant had requested and did receive the Appellant Box record on Oct. 6, 2020. (Case No. M2018-02001-COA-R3-CV).

4. The attached Exhibit 1 transcript copy is far superior in quality and contains significant sworn testimony about the John Perry child sex abuse cover-up which includes the sexual molestation of an 11-year old victim across state lines in violation of the Federal Mann Act. Exhibit 1 – Pg 24-25.

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

A. I believe the age when RED was first sexually abused-- is that what you're asking me?

Q. Uh-huh.

A. Was 11.

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

A. Multiple times.

Q. Is it constrained just to Tennessee?

A. No.

Q. What other states?

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

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

A. Yes, sir.

5. Since the John Perry Mann Act Federal crime cover-up is still on-going before Almighty God and the Tennessee Court of Criminal Appeals, Appellant now provides the Honorable

Court with the superior transcript copy prior to the 3<sup>rd</sup> and Final Presidential Debate scheduled at Belmont University on Oct 22, 2020, and prior to the Tennessee - 2020 Presidential Election early voting which begins on Oct 14, 2020, and for the pursuit of “*substantial justice*” in the Appellant’s case now before the Honorable Court.

6. During the sworn deposition, child sex abuse therapist witness, Caroline Cone, testified that she thought the Appellant’s conduct was “*creepy*” because the Appellant attempted to warn mothers and fathers in the Covenant - Stephens Valley – MBA - Harpeth Hall - Julia Green - St. Paul Christian Academy - Brentwood Academy communities about a protected child molester, John Perry, an adult man Ms. Cone had worked with in at least one intimate counseling session, who lived, or still lives, on Belle Meade Blvd., about 12 houses away from the 6<sup>th</sup> grade Brentwood Academy alleged gang rape victim. (*Note: Asst. DA Jenny Charles made the same “creepy” allegation in her attempt to justify her “malicious prosecution” of the Appellant before a trial jury that is now discovered to include one juror who lived, or still lives, on the same “Bresslyn Road” as the protected child-molester John Perry, along with numerous Covenant families.*) Exhibit 1 – Pg 18. 5 Exhibit – Motion For New Trial – 3 of 4 – Transcript of Trial – Vol 2 Pgs 23-24

Q. And are you aware or have you been made aware of the fact that your photograph and description of your testimony in that earlier hearing has been posted by Mr. Davis on the internet.

A. Yes, sir. I was made aware of it by several people. It think it’s creepy.”

7. On Oct 20, 2017, MBA Headmaster Brad Gioia emailed MBA parents that he had contacted MBA security and Nashville Police prior to the MBA vs. Brentwood Academy football game resulting in the Appellant being jailed for 18 days in retaliation for the

Appellant providing truthful information to the MBA – Brentwood Academy communities concerning Attorney Larry Crain’s direct connection to two defamation lawsuits filed in Nashville: a) A \$3 million “*invasion of privacy – defamation*” lawsuit against the Appellant to protect the John Perry child sex abuse cover-up case; b) A \$1.5 million lawsuit against the mother of 6<sup>th</sup> grade Brentwood Academy student who was allegedly gang raped and who lived, or still lives, approximately 12 houses away from protected child-molester John Perry. (*Note: The lawsuit against the victim’s mother was filed when the victim’s mother refused to remove paragraph 15 from the Brentwood Academy alleged gang rape lawsuit. Paragraph 15 referred to the alleged bullying of the victim’s sibling at a private elementary school in Green Hills, which is St. Paul Christian Academy. Mr. Ken Cheeseman was Head of School at St. Paul during the time of the alleged bullying, and was also a member of Covenant Leadership during the bullying and abuse of a banned and molested former Harpeth Hall – Belmont University female student. Mr. Ken Cheeseman and Mr. Brad Gioia hosted Trinity Events at Montgomery Bell Academy.*) TE Vol 13. TR Vol 3 – Pg 394. TR Vol 3 – Pgs 333-335. TR Vol 3 – Pg 345. [www.thesilentbell.org](http://www.thesilentbell.org)

8. Appellant believes it is “*creepy*” that three years later on the day of the MBA vs. Brentwood Academy football game, Appellant is filing a 4<sup>th</sup> post-judgment motion and new Webb Head of School Ken Cheeseman and MBA Headmaster Brad Gioia still have not been truthful with thousands of MBA and St. Paul Christian Academy Alumnae and Families about a Mann Act Federal crime cover-up involving numerous Covenant Presbyterian Church families, Webb Head of School Ken Cheeseman, MBA Headmaster Brad Gioia, and three of Brad Gioia’s MBA faculty members who are also Covenant

Leaders: Roderick Russ, Robert Sawyer, and Mike Martin. TR Vol 3 – Pg 340.  
[www.thesilentbell.org](http://www.thesilentbell.org)

9. Appellant believes it is “*creepy*” that MBA Headmaster Brad Gioia will make a public statement to tell the truth about the Tennessee Titans practicing at the MBA campus during a major Covid 19 outbreak, but Mr. Gioia will not make a public statement to tell the truth about a John Perry child sex abuse cover-up effort, or former Tennessee Titans Quarterback Steve McNair’s rigged grand jury that included former police officer Richard Hillenbrand as the grand jury foreman. (*Note: Several Tennessee Titans who played with Steve McNair are among the MBA families, and former Tennessee Titans player, Eddie George, was recently added as a MBA Board Member.*) [www.thesilentbell.org](http://www.thesilentbell.org)
10. Appellant believes it is “*creepy*” for child-molester John Perry, child sex abuse therapist Caroline Cone, child sex abuse victim **REDACTED**, aka **REDACTED**, the former Mrs. John Perry (Susan Ann Clark), Mr. Bill Clark, new Webb Head of School Ken Cheeseman, MBA Board Member Wife Mrs. Edward (Molly) Powell, MBA Headmaster Brad Gioia, MBA Faculty Members and Covenant Leaders Roderick Russ, Robert Sawyer, and Mike Martin, Attorney Worrick Robinson, and Attorney Larry Crain, to all be on the same John Perry child-molester protection team.
11. Appellant believes it is “*creepy*” that child sex abuse therapist, Caroline Cone, would not answer the Appellant’s direct question on whether or not child sex abuse is a “*private matter.*” Exhibit 1 – Pg 26

By Mr. Davis:

Q. I mean, I’m not in this world, in this realm at all. I’m not trained; I’m not a professional. You’re obviously a professional now trained in the medical world. I’m just an average

person. Is child-- and there are privileges that are thrown out, clergy privilege-- which I'm sure the Catholic Church would like to be using a lot-- professional, and so I'm just curious with child-molesters, is it a private matter? Child sex abuse?

Mr. Crain: Objection as to form.

The Witness: I'm not sure what you're asking.

By Mr. Davis:

Q. Is it a private matter? Is an adult sexually abusing a child a private matter?

Mr. Crain: Same objection.

The witness-- So—

12. Per the audio-video recording of Ms. Cone's deposition, there was a long awkward pause at this point in the deposition and Ms. Cone chose not to answer the Appellant's question about whether or not adult child sex abuse is a "*private matter*" protected by professional or clergy privileges.

13. Appellant believes it is "*creepy*" that child sex abuse expert witness, Caroline Cone, provided intimate counseling to child-molester John Perry, and child-molester John Perry's victim, REDACTED, aka REDACTED. Exhibit 1 – Pg 30

Q. Did you ever counsel RED and John Perry?

A. Yes.

Q. So RED and John Perry actually sat down and had counseling with you?

A. Yes. It was appropriate.

Q. What does that mean that it's "*appropriate*?"

A. What it means is that through the process-- what's healthy if someone has been sexually abused, is to be able to verbalize what's happened to them and then to be able to tell the

person who did that to them what happened and what it meant to them. It's a normal part of the program in treatment, and that's what happened.

14. Appellant believes it is "creepy" to learn that child sex abuse victims and child-molesters in Nashville are receiving intimate and possibly shielded "confidential" counseling together as a normal healthy part of child sex abuse treatment programs in Nashville-- without being reported to Nashville Police or DCS-- which is effectively a legalized method to shield and protect adult sex predators to the great disadvantage and endangerment of other vulnerable children, and to cover-up child sex abuse related criminal activity. Jerry Sandusky, Larry Nassar, and other sex predators during the Netflix "Cuties" Era should serve as glaring examples of why it is important to report known child-molesters, rather than to protect them.

15. Appellant believes it is "creepy" to learn from child sex abuse therapist, Caroline Cone, that she did not have to report John Perry's child sex abuse to DCS, and that DCS does not investigate child sex abuse cases after a child has turned the age of 18. (*Note: DCS officials and Gov. Bill Haslam did not inform the Appellant of this shocking "over 18" DCS Policy when Gov. Bill Haslam provided the child sex abuse cover-up information to former DCS Commissioner Kate O'Day on Aug 22, 2012*). Exhibit 1 – Pg 25. TR Vol 1 – Pgs 50, 124.

A. Well so, let me talk a little bit about the whole concept of reporting. When the client came to me, RED was 18 years old. And because RED was 18 years old, I actually did not have to report it, but I did call DCS, and I said, "I have a child who was sexually abused as a minor, now RED's 18; what do I do?" And they said that they do not handle cases after a child turns 18.

16. Appellant believes it is “creepy” that child sex abuse therapist, Caroline Cone, provided sworn testimony on March 14, 2016, that she did not know about other vulnerable children being placed in John Perry’s “safe house” around the same period of time that child-molester John Perry was repeatedly molesting an 11-year old victim, including child sex abuse across state lines in violation of the Federal Mann Act. 2<sup>nd</sup> Motion To Consider Post-Judgment Facts - Exhibit 1 – Pgs 24-25

Q. (By Mr. Davis) Did you know other children had been put in the molester’s house back in 2002?

A. Other children had been put—

Q. Yes, the safe house, and there were other children, put back in his house, little girls, small kids.

A. I did not know that.

Q. Yes. That was done in 2002 –

Mr. Crain: Objection. That’s testimony your honor.

The Court: You’re testifying. You’re trying to—

Mr. Davis: I’m not trying to—

The Court: You asked her a question: Was she aware of a safe house back in 2002. Her answer was no. She was not aware. Then you said: Well, you know, it was this, this was going on. That’s not-- ask a question.

Q. (By Mr. Davis): As a person that deals with people who have been molested, is that a concern to you?

A. That it was a safe house?

Q. No, that John Perry had children that the church put in that house with him back at the same time when the victim was being molested.

A. That would be a concern for me.

Mr. Davis: Thank you.

17. Appellant believes it is “*creepy*” that Detective Chuck Fleming apparently didn’t know that child sex abuse across states lines is a violation of the Federal Mann Act with no statute of limitations, especially since child sex abuse therapist, Caroline Cone, and John Perry’s child sex abuse victim, REDACTED, aka REDACTED, both met with Nashville Police Detective Chuck Fleming for several hours telling Detective Fleming everything about John Perry’s child sex abuse. Exhibit 1 – Pgs 10 – 12

*By Larry Crain:*

Q. Do you recall a time around October of 2012 when you received a phone call from a detective with Metropolitan Police Department?

A. I do.

Q. And what was the purpose of his call?

A. He called me because he said that there was an investigation that there had been a complaint about-- in this sexual abuse case had not been handled appropriately, and so he wanted to meet with me at that time. And actually, I wouldn’t – I didn’t talk to him until I first talked to my client to make sure that is was okay that I talked to him. Confidentiality.

Q. Sure. Sure. When you talked to REDACTED and said that you had been contacted by the police department here, Metro, do you recall RED initial reaction?

A. So actually RED called me.

Q. Okay.

A. -- and said, "Hey, this detective is going to call you," and RED was wiggling out. But RED was just completely anxious and totally upset, very distraught, and really did not want to see the detective except in a session with me."

Q. Did you accommodate the police at that time and agree to meet with your client and them in your office?

A. Yes, sir.

Q. And describe that meeting, if you would please?

A. So the detective came to my office and RED came to my office, and the three of us sat around and it was probably a good two and a half hours. And we just-- he asked all of his questions, discussed the case from beginning to the end. It was very-- it was very anxiety provoking. It was very traumatic to revisit everything all over again.

Q. So in terms of your own observations during that meeting, what did you observe with respect to REDACTED in terms of whether RED held back or attempted to conceal any information from police?

A. RED was completely open and honest. And all of the things that RED told me in therapy were the exact same things that RED told the detectives as well.

Q. Are you aware of any effort by REDACTED since you've been treating RED since 2008, of any effort by REDACTED to involve self in the conspiracy to cover-up any information or conceal from the authorities any information about RED childhood trauma?

A. Not at all.

18. Appellant believes it is "creepy" that Nashville Police have actively and aggressively protected child-molester John Perry for more than a decade, and that Nashville Police Detective Chuck Fleming did not inform child sex abuse therapist, Caroline Cone, that

Nashville Police had intimidated, threatened and silenced the Appellant's family in July 2008, or that Appellant had reported unwarranted police intimidation and threats to the Nashville Police Office of Professional Accountability in 2009. Exhibit 1 – Pgs 34-35

By Mr. Davis:

Q. I have bad hearing so when you mentioned that the police had contacted you, who was the police officer again?

A. Chuck Fleming.

Q. Chuck Fleming. And you met with him in October 2012.

A. Yes, sir.

Q. During the injunction hearing, you said that you had not met with him until I think it was the summer of 2013?

A. I met with him October 22<sup>nd</sup>, 2012.

Q. October 22<sup>nd</sup>. And you met with him and REDACTED ? Where was that meeting?

A. In my office.

Q. Did you say that he said it hadn't been appropriately handled or something?

Mr. Crain: Objection.

The Witness: He didn't say that.

By Mr. Davis:

Q. I couldn't understand when you all were talking about it-- I have trouble hearing.

What did he say then? What-- you said you spent two and a half hours with him or something. What—

A. He said that he would-- there was a complaint, and that he was following up with the complaint. And the complaint was that-- I believe it was you who had called and said that the church didn't appropriately handle a sexual abuse case.

Q. Did he tell you that the police had silenced me in 2008, in July of 2008? Did the police officer tell you that in your meeting?

A. No, sir.

Q. Did he tell you that we had been threatened?

A. No, sir.

Q. Did he tell you that we had been to the OPA Department at the police department in 2009?

A. No.

19. Appellant believes it is "*creepy*" that new interim Nashville Police Chief John Drake and Detective Chuck Fleming still have not responded to numerous post-judgment emails sent to them and hundreds of other Nashville Police officers about the John Perry child sex abuse cover-up which is still on-going before the Tennessee Court of Criminal Appeals.

Exhibit 2

20. Appellant believes it is "*creepy*" Detective Chuck Fleming and the Nashville Police Department continue to support protected child-molester John Perry and Covenant Presbyterian Church Leadership during a Mann Act Federal crime cover-up, even though child sex abuse therapist, Caroline Cone, has provided sworn testimony on two different occasions, March 14, 2016, and Sept 11, 2018, that Covenant Session Member, Pastor Larry Ferris, knew about John Perry's child sex abuse in April 2008, three months before

Nashville Police were used to silence, threaten, and to intimidate the Appellant and his family on July 2, 2008. Exhibit 1 – Pgs 21-22

By Mr. Davis:

Q. I'm not a trained lawyer, so I will-- you'll have to bear with me. I'm sure you'll stop me if I ask something I'm not supposed to, but I do have some questions I would like to ask. They're kind of compartmentalized, like the child sex abuse, the counseling, the police, just different issues. So I may bounce around, but anyway I'll do the best I can.

Mr. Crain said April 2008 was your first time you did any counseling with REDACTED ; that's correct?

A. Yes, sir.

Q. In the injunction hearing, RED answered the question that RED had been meeting with you for ten years, so that would take it back to 2006. Did you counsel with RED before?

A. No, sir, we started in April of 2008.

Q. April 2008. Okay. And in the injunction hearing, you said that Larry Ferris was the one that contacted you from Covenant.

A. Uh-huh.

Q. So how did it all come about? What is it exactly that happened because you got contacted before and then met with REDACTED and RED after?

A. Well, so what happened is Mr. Ferris called me on the phone and said, "Hey, we have something that just came up in our church. Do you have room for a new client?" And I said, "Yes, I do." And he told me a little bit about what happened. And so then we made the appointment, and who came to the first appointment was both REDACTED and REDACTED ."

21. Ex-Covenant Pastor Larry Ferris, DA Prosecution Witness Scott Troxel, and other Covenant Leaders along with Nashville Police have now protected John Perry's Mann Act Federal crime cover-up for twelve years by demonizing, criminalizing and prosecuting Appellant Willie Austin Davis as a potential Adam Lanza – Sandy Hook style “*church shooter threat*” without remorse or regret. TR Vol 1 – Pgs 57, 98-103, 139. 5 Exhibit – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 – Pg 89.
22. With this superior quality transcript of child sex abuse therapist, Caroline Cone, now provided to the Tennessee Court of Criminal Appeals during the on-going Mann Act Federal crime cover-up, Appellant respectfully requests that the Court grant this motion to consider this exculpatory information and these pertinent facts about John Perry's child sex abuse of an 11-year old child across state lines, in relation to and in the context of the memorandum of law (attached hereto and incorporated by reference), exhibits (attached hereto and incorporated by reference), and sworn affidavit (attached hereto and incorporated by reference) in such a manner as the Court shall deem fair.
23. In support hereof, Appellant submits the sworn affidavit of Austin Davis, a memorandum of law in accordance of Rule 14(b) and Rule 22(a) of the Tennessee Rules of Appellate Procedure, and supporting background exhibits, all of which are incorporated herein by reference.

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 Oct 9, 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

  
\_\_\_\_\_

Willie Austin Davis, Citizen  
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Memorandum of Points and Authorities  
Introduction

Appellant brings this motion pursuant to Tenn. R. App. P. 14 to provide the court a superior transcript copy with exculpatory evidence obtained from child sex abuse therapist Caroline Post Cone which proves that DA Star Prosecution Witness Scott Troxel deliberately committed perjury to protect child-molester John Perry and a Mann Act Federal crime cover-up which is still ongoing before the Tennessee Court of Criminal Appeals. Exhibit 1

Background

The sworn testimony of child sex abuse therapist witness, Caroline Cone, is additional evidence that DA Star Prosecution Witness Scott Troxel's fellow Covenant Session Member, Pastor Larry Ferris, knew about John Perry's child sex abuse and a Mann Act Federal child sex abuse "*crisis*" at Covenant Presbyterian Church in April 2008, about three months before Nashville Police threatened and silenced the Appellant from asking questions about the safety and welfare of numerous children placed in John Perry's "*safe house*" on July 2, 2008. Exhibit 1 – Pgs 21-22. Appellant's Brief – Pgs 20 - 28

Three months later, on June 27, 2008, DA Star Prosecution Witness Scott Troxel possibly violated Federal U. S Mail laws by mailing the Appellant a false, unauthorized trespass letter which was threatening to the Appellant as part of the Larry Ferris-Covenant "*crisis management*" effort to falsely criminalize the Appellant as a potential crazy church shooter threat to protect a real threat to children, John Perry, a known confessed child-molester who was a Covenant Presbyterian Church Founder and Deacon.

In 2012, Covenant Pastor and Session Member Pastor Larry Ferris fled across state lines to Easley, SC, where Pastor Larry Ferris is now greatly rewarded with a promotion to a senior pastor position at Covenant Presbyterian Church within the Presbyterian Church in America.

Appellant is now providing the Honorable Court an additional superior copy of the sworn testimony by child sex abuse therapist witness, Caroline Cone, because the John Perry child sex abuse Mann Act Federal crime cover-up is still on-going endangering the safety and welfare of other children in Nashville, and beyond. Exhibit 1

#### Standard

The Court of Criminal Appeals on its motion or on motion of a party may consider facts concerning the action that occurred after judgment. Tenn. Rule App. P. 14(a). “Consideration of such fact lies in the discretion of the Appellate Court.” *Id.* “While neither controlling nor fully measuring the court’s discretion, consideration generally will extend to those facts, capable of ready demonstration, affecting the positions of the parties or the subject matter of the action such as mootness, bankruptcy, divorce, death, or other judgments or proceedings, relief from the judgment requested or granted in the trial court, and other similar matters.” *Id.* “The appellate court may grant or deny the motion in whole or in part and subject to such conditions as it may deem proper.” Tenn. R. App. P. 14(b). “If a motion to consider post-judgment facts is granted or the appellate court acts on its own motion, the court, by appropriate order, shall direct that the facts be presented in such a manner and pursuant to such reasonable notice and opportunity to be heard as it deems fair.” Tenn. R. App. P. 14(c)

**I. The Sworn Testimony Of Child Sex Abuse Therapist Caroline Cone Merits Review For Substantial Justice**

Of matters that can properly be considered on a motion to consider post-judgment facts, the Tennessee Supreme Court has found, “[s]ometimes the court is in need of extraneous evidence representing some situation or fact to enable it to determine, not the propriety of the conduct... but the nature of the judgment to be directed..” *Duncan vs. Duncan*, 672 S.W.2d 765, 767-768 (1984) (citation omitted). “Sometimes a document, or public record, or other item of evidence like character, material to a proper determination of appeal and substantially uncontestable, is called for, or is examined if produced, and then is treated in the same way as an admission of the parties would be treated if found in the record.” *Id.* at 768 (1984) (citations omitted).

The undisputed facts show that Covenant Session Member Larry Ferris clearly knew about John Perry’s child sex abuse in April 2008 and that Covenant Clerk of Session Scott Troxel and the Covenant Session knew about John Perry’s child sex abuse when they accepted John Perry’s resignation from Covenant Leadership on July 14, 2008. The undisputed facts also show that Covenant Leadership wrongfully used Nashville Police Sgt. Twana Chick to provide a false security briefing with Covenant Deacons in the Covenant Board Meeting, but that no one in Covenant Leadership reported child-molester John Perry to Nashville Police, even though the Tennessee statute of limitations had not expired on July 14, 2008, and were not set to expire until July 11, 2010, and the Mann Act Federal crime child sex abuse statute of limitations do not have a statute of limitations and never expire. The undisputed facts prove that Covenant Session Member Larry Ferris, Covenant Clerk of Session Scott Troxel, and Covenant Leadership

intentionally protected child-molester John Perry while falsely criminalizing the Appellant Austin Davis as a possible “*church shooter*” threat and danger to children.

### Conclusion

For the reasoning stated above, and to restore truth, tranquility, and peaceful order to the worship of Almighty God at Covenant Presbyterian Church during a time when government authorities are unconstitutionally crushing and shutting down the public worship of Almighty God all across America, and all across the world, it is appropriate and the high ethical duty of the Honorable Court to sever the unhealthy “*church-state*” alliance at Covenant to consider the post-judgment facts of the Caroline Cone sworn court testimony which occurred at Attorney Larry Crain’s Office on Sept 11, 2018, exactly one year after the Appellant’s unfair and prejudiced trial which occurred before Judge Steve Dozier on Sept 11, 2017.

The Preamble to the Tennessee Code of Judicial Conduct – Rule 10 states: “An independent, fair, and impartial judiciary is indispensable to our system of justice. The United States legal system is based upon the principle that an independent, impartial, and competent judiciary, composed of men and women of integrity, will interpret and apply the law that governs our society. Thus, the judiciary plays a central role in preserving the principles of justice and the rule of law. Inherent in all the Rules contained in this Code that judges, individually and collectively, must respect and honor the judicial office as a public trust and strive to maintain and enhance confidence in the legal system.”

Rule 2.15 A of the Tennessee Code of Judicial Conduct – Rule 10 states: “A judge having knowledge that another judge has committed a violation of this Code that raises a substantial

question regarding the judge's honesty, trustworthiness, or fitness as a judge in other respects shall inform the appropriate authority.”

Rule 2.15 B of the Tennessee Code of Judicial Conduct – Rule 10 states: “A judge having knowledge that a lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question regarding the lawyer’s honesty, trustworthiness, or fitness as a lawyer in other respects shall inform the appropriate authority.”

Rule 2.15 C of the Tennessee Code of Judicial Conduct – Rule 10 states: “A judge who receives information indicating a substantial likelihood that another judge has committed a violation of this Code shall take appropriate action.”

Rule 2.15 D of the Tennessee Code of Judicial Conduct – Rule 10 states: “A judge who receives information indicating a substantial likelihood that another lawyer has committed a violation of the Rules of Professional Conduct shall take appropriate action.” May God bless the Honorable Court.

Respectfully Submitted,



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**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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**DECLARATION OF APPELLANT WILLIE AUSTIN DAVIS**

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1. I, Willie Austin Davis, am an adult citizen, and resident of Nashville, Tennessee and do make this declaration based on my own personal knowledge.
2. I am presently 65 years of age.
3. On Oct 6, 2020, I filed 2<sup>nd</sup> and 3<sup>rd</sup> Motions To Consider Post-Judgment Facts at the Tennessee Supreme Court Building. An Appellate Court staff member informed me that an Appellate Record box in a related child sex abuse cover-up case was ready for me to pick up (Case No. M2018-02001-COA-R3-CV). The Appellate Record box contained a sworn deposition of Caroline Cone which is included as Exhibit 1 in the Appellant's 4<sup>th</sup> Motion to Consider Post-Judgment Facts.
4. The newly obtained Caroline Cone sworn deposition is superior in quality to the photographed Caroline Cone sworn deposition previously provided to the Tennessee Court of Criminal Appeals.
5. The Caroline Cone sworn deposition was taken at the office of Attorney Larry Crain on Sept 11, 2018, a year after the my trial before Judge Steve Dozier which began on Sept 11, 2017.
6. Child sex abuse victim, **REDACTED**, aka **REDACTED**, attended the trial of Austin Davis on Sept 11, 2017, and was friendly in the courtroom with DA Prosecution Witnesses and Covenant Leaders Scott Troxel and Federal Judge John Bryant who provided untrue sworn testimony against me during the trial.

7. A Mann Act Federal crime cover-up is still on-going before the Tennessee Court of Criminal Appeals to protect Gov. Mike Huckabee and Rev. Franklin Graham's co-author, John Perry. 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/>

8. I personally wrote the Exhibit 2 email to new interim Nashville Police Chief John Drake on Sept 8, 2020. I also copied Nashville Police Detective Chuck Fleming, along with others. I did receive a "creepy" photograph from the email address of former or current Covenant Member Derek Blank in response to as email sent on Aug 26, 2020. To date, new interim Nashville Police Chief John Drake and Nashville Police Detective Chuck Fleming have not responded.

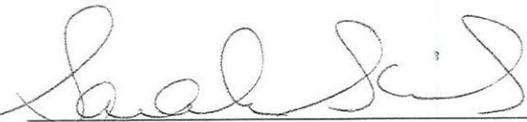
I declare under penalty of perjury that the foregoing is true and correct. Executed by me this 9th day of October, 2020.

  
Willie Austin Davis – Citizen Appellant

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

Personally appeared before me, Sarah Skiles, 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 his information, knowledge, and belief.

Sworn to and subscribed before me this 9 day of October, 2018.

  
Notary Public

My commission expires: 10/2/2023



My Commission Expires  
October 2, 2023

**SIXTH CIRCUIT COURT  
DAVIDSON COUNTY, TENNESSEE**

THOMAS W. BROTHERS, JUDGE  
RICHARD R. ROOKER, CLERK

**FILED**  
JAN 22 2019  
Clerk of the Appellate Courts  
Rec'd By \_\_\_\_\_

**REDACTED**

Plaintiff / Appellee

CERTIFIED  
Transcript  
of  
Cause

Appearance No. **REDACTED**  
CIRCUIT COURT

DESIGNATED RECORD

VS

No.

**REDACTED**

COURT OF APPEALS

Execution No. \_\_\_\_\_  
SUPREME COURT

APPEALED  
TO  
Next Term,  
20

TRANSMITTED ON:

1-4-19

AUSTIN DAVIS

Defendant / Appellant

**DEPOSITION**

1 IN THE SIXTH CIRCUIT COURT  
2 FOR THE TWENTIETH JUDICIAL DISTRICT OF TENNESSEE  
3

4 **REDACTED**

5 )  
6 Plaintiff, )

7 vs. )

8 No. **REDACTED**

9 AUSTIN DAVIS, )

10 Defendant. )  
-----

11  
12 Videotaped Deposition of

13 CAROLYN CONE

14 Taken on behalf of the

15 Plaintiff

16 September 11, 2018

17 1:14 p.m.  
18

19  
20 Reported by:  
21 Harpeth Court Reporters  
22 Franklin, Tennessee  
23 Ariela Pastel, LCR, CSR  
24  
25

FILED

Facsimile Rec'd 9/19/18 2:41p

SEP 19 2018

RICHARD R. ROOKER, Clerk  
By *Mesury* Deputy

REDACTED

VS

**AUSTIN DAVIS**

FILED

JAN 22 2019

Clerk of the Appellate Courts  
Rec'd By \_\_\_\_\_

Deposition of

**CAROLYN CONE**

*September 11, 2018*

**H**

HARPETH  
COURT REPORTERS

(615) 933-6786

[www.harpethcourtreporters.com](http://www.harpethcourtreporters.com)

In an abundance of caution, *protected information* is **REDACTED** in submission to Attorney Larry Crain's limited injunction granted on 9/24/2018. Attorney Larry Crain represents child-molester John Perry, and John Perry's child sex abuse Victim #1.

Page 21

EXAMINATION

14

15 BY MR. DAVIS:

16 Q. I'm not a trained lawyer, so I will -- you'll  
17 have to bear with me. I'm sure you'll stop me if I  
18 ask something I'm not supposed to, but I do have some  
19 kind of questions I would like to ask. They're kind  
20 of compartmentalized, like the child sex abuse, the  
21 counseling, the police, just different issues. So I  
22 may bounce around, but anyway I'll do the best I can.

23 Mr. Crain said April 2008 was your first time  
24 you did any counseling with **RED.**; that's correct?

25 A. Yes, sir.

Page 22

1 Q. In the injunction hearing, RED answered the  
2 question that RED had been meeting with you for ten  
3 years, so that would take it back to 2006.  
4 Did you ever counsel with RED 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 RED 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 RED and RED.  
20 Q. Do you know why he picked you as a person to  
21 contact?  
22 A. My understanding was that he called a friend  
23 of mine who is also a therapist, and she couldn't take  
24 them at first and gave him my name. And otherwise, I  
25 don't have any idea why I got the call.

Page 23

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

Page 24

1 he?  
2 A. Well, he was. He's not been in the program  
3 since I've been there.  
4 Q. He wasn't in the program back in 2008?  
5 A. Well, I don't know if he was there in 2008. I  
6 only started working there, I believe, in 2012 or so.  
7 Q. In the lawsuits, they've given the ages 11 and  
8 then they changed it; they went to 12. Do you know  
9 what the age was?  
10 A. I believe the age when RED 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 RED go over that or give you any  
25 information on those states, where it was?

Page 25

1 A. Yes, sir.  
2 Q. The reason I'm asking is because there's laws  
3 in different state and different statutes of  
4 limitations in other states, and so just curious if it  
5 got reported in the other states.  
6 A. Well so, let me talk a little bit about the  
7 whole concept of reporting. When the client came to  
8 me, RED was 18 years old. And because RED 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 she's 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. CRAM: 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

Page 26

1 thrown out, clergy privilege -- which I'm sure the  
2 Catholic Church would like to be using a lot --  
3 professional, and so I'm just curious with child  
4 molesters, is it a private matter? Child sex abuse?  
5 MR. CRAIN: Objection as to form.  
6 THE WITNESS: I'm not sure what you're  
7 asking.  
8 BY MR. DAVIS:  
9 Q. Is it a private matter? Is an adult sexually  
10 abusing a child a private matter?  
11 MR. CRAIN: Same objection.  
12 THE WITNESS: So --  
13 BY MR. DAVIS:  
14 Q. Do you know if the victim was asleep or awake?  
15 A. At different -- I think RED was asleep at some  
16 instances.  
17 Q. The police refer to it as "sexual battery." I  
18 don't know what all the qualifications are what makes  
19 it sexual battery or what makes it something else as  
20 far as those.  
21 Do you know?  
22 A. Uh-uh.  
23 Q. Did RED go over what it was that was done to  
24 RED ?  
25 A. Uh-huh.

Page 27

1 Q. Okay. You said you reported it to DCS. They  
2 didn't keep a record or investigate?  
3 A. No, because when I called and said to them I  
4 have an 18-year-old child; RED was molested as a  
5 child, younger than age 18, they said that they don't  
6 take reports on that. So . . .  
7 Q. And you did that -- when did you make that  
8 report or that call?  
9 A. I made that call in April or May of 2008, as  
10 soon as I had seen them once or twice and gotten a  
11 handle on what exactly was going on.  
12 Q. Was any other child sexually abused by John  
13 Perry?  
14 A. I have no idea.  
15 Q. In the injunction hearing, I asked you about  
16 John Perry's safe house, whether other children were  
17 placed in 2002.  
18 A. I don't know anything about that.  
19 MR. CRAIN: I object to the relevance.  
20 But you've answered the question.  
21 BY MR. DAVIS:  
22 Q. So you're mainly focused on a victim. Is  
23 there ever a case where there's secondary victims in a  
24 child sex abuse case?  
25 A. Would you describe what you mean by that for

Page 28

1 me?  
2 Q. One child is molested. Two friends are around  
3 the molester, or somebody else who wants to cover that  
4 up threatens the other two people not to talk about  
5 it.  
6 A. Are you asking for my opinion on that, or  
7 what -- help me understand what you want me to answer.  
8 Q. Well, we're talking about REDACTED and  
9 what's going on with RED. But in a case -- and he's  
10 talking about publicity and the widespreadness and  
11 making it known, but if there were threats made  
12 against people or actions taken against people who  
13 knew about the child sex abuse or the molester and  
14 began trying to talk about it and they were threatened  
15 as a result of that, are they victims? Are they not  
16 victims?  
17 A. I'm not --  
18 MR. CRAIN: Let me object to the question  
19 in that it calls for speculation.  
20 You can answer.  
21 THE WITNESS: So I'm not aware of any  
22 threats related to this case.  
23 BY MR. DAVIS:  
24 Q. I remember in the injunction hearing, there  
25 was a scale and you talked about RED almost being

Page 29

1 catastrophic when you met RED. Now, this isn't  
2 after I'm speaking out, but at that point in time, can  
3 you go a little bit more into that, what -- how bad it  
4 was when you first met RED in April of 2008 when you  
5 started talking to RED?  
6 A. So catastrophic is -- when we're talking about  
7 this, we're talking about the DSM diagnosis. So it's  
8 the Diagnostic and Statistical Manual of Mental  
9 Disorders, that's what we call the DSM. At that time  
10 it was the DSM-4, I believe. Now there's a DSM-5  
11 that's out. But when you list the diagnosis, you have  
12 an Axis I, an Axis II, an Axis III, an Axis IV, and an  
13 Axis V. And on Axis IV, we code the psychosocial  
14 stressors, and they range from mild, moderate, severe,  
15 catastrophic.  
16 And what I was saying back at the injunction  
17 was the fact that RED stressors appeared to be severe,  
18 maybe even leaning toward catastrophic. In other  
19 words, what happened when the abuse finally came out,  
20 is everything blew up. And not only is all of RED--  
21 this vulnerability and rawness that RED had been  
22 sexually abused laid open for everybody to see, but  
23 the RED also basically implodes. And then, you  
24 know, there's issues with the church and all of that  
25 kind of stuff. So RED severe stressors were coded on

Page 30

1 Axis IV as severe psychosocial stressors.  
2 Q. You said RED and RED came to the first  
3 visit. Did you counsel RED and RED, or do you  
4 counsel just RED or --  
5 A. Counseled them both together.  
6 Q. Did you ever counsel RED and John Perry?  
7 A. Yes.  
8 Q. So RED and John Perry actually sat down and  
9 had counseling with you?  
10 A. Yes. It was appropriate.  
11 Q. What does that mean that it's "appropriate"?  
12 A. What it means is that through the process --  
13 what's healthy if someone has been sexually abused, is  
14 to be able to verbalize what's happened to them and  
15 then to be able to tell the person who did that to  
16 them what happened and what it meant to them. It's a  
17 normal part of the progress in treatment, and that's  
18 what happened.  
19 Q. Did you counsel REDACTED ?  
20 A. I was not an individual therapist for RED.  
21 RED has been in a session or two.  
22 Q. Did you -- when they contacted you in  
23 April 2008, did you help facilitate them going to PCS  
24 in Arizona?  
25 A. I did not. I may have suggested that that

Page 31

1 would be a good option, but they set it all up. I  
2 believe John went and Susan Ann went.  
3 Q. The reason I ask is because Vanderbilt has got  
4 some kind of tied to PCS, so I thought that was --  
5 A. I am not aware that Vanderbilt has any tie to  
6 PCS. I don't know anything about that.  
7 Q. Is that something that is normal? If there's  
8 somebody, they're molesting children, is that a normal  
9 thing that they would go to PCS and get treated?  
10 A. It's a normal thing that they get treated.  
11 Whether they use PCS or someone else, I mean that's up  
12 to them.  
13 Q. Do they get reported to law enforcement or  
14 they just get treated?  
15 A. Well, my understanding is that when the victim  
16 is of a certain age and that would be 18 and older, it  
17 is up to them to bring charges against the person who  
18 victimized them.  
19 Q. When you met with RED and counseled RED, was  
20 there ever any possibility that it was going to be --  
21 I mean, you called DCS. So obviously, if you called  
22 DCS, would they have -- would you have -- would there  
23 have been any preparation during that that this might  
24 go to the court or that we may be, you know, doing  
25 anything with the police or with anybody? I'm talking

Page 32

1 about April of 2008.  
2 A. So you're asking me -- let me see I've got  
3 this right -- if in April of 2008, I anticipated going  
4 to court? Or what?  
5 Q. Well, I'm saying that they contact you, you  
6 said I don't know whether -- you don't really know the  
7 nature of it. You start hearing whatever it is, what  
8 you're being told.  
9 To me, I'm a novice. You do this all day long  
10 so everybody that comes to you -- you said 50 to  
11 75 percent of your people are sexual trauma victims,  
12 so that's your life; that's not mine. If I'm told  
13 that, just like if I'm told there's a bank robber or  
14 anything else, I might be going to the phone and  
15 calling the police, and then headed into that realm.  
16 And so I'm just asking, when you go over and  
17 pick that phone up and make that phone call to DCS,  
18 you obviously have come to a place where you think  
19 it's serious enough that you're making a phone call to  
20 the authorities.  
21 A. Uh-huh.  
22 Q. So do you have a lot of evidence at that point  
23 in time? Have you sat down and spent a bunch of time?  
24 I mean I'm just trying to figure out, did RED say this  
25 is all the times, these are the places, you've gone

Page 33

1 through, and you're making the call or --  
2 MR. CRAIN: Objection.  
3 You can answer.  
4 THE WITNESS: Typically -- I mean we had  
5 just grazed the surface of what had happened, and we  
6 had not gone into detail when I made the first call to  
7 DCS to find out if this was reportable.  
8 BY MR. DAVIS:  
9 Q. Was the child molester sexually abused?  
10 MR. CRAIN: Objection; irrelevant.  
11 THE WITNESS: I don't know.  
12 BY MR. DAVIS:  
13 Q. What -- what is this class -- is this a  
14 mental illness? What is this?  
15 A. What is -- what is what?  
16 Q. Anyone that wants to go and -- go in the room  
17 of a sleeping RED or whatever, is 10, 11, 12 years  
18 old, and molest them in the middle of the night or  
19 whatever, is that a -- is that classified as a mental  
20 illness? Is there something that the health officials  
21 have put on this?  
22 A. Well, so I mean are you asking me to get into  
23 the origins of what would cause somebody to do that?  
24 Q. Yeah, I think most people don't -- have a hard  
25 time understanding that, and they can't get their mind

Page 34

1 around that, so I'm just -- I don't know?

2 MR. CRAIN: Objection. Pardon me,

3 objection again as to relevance.

4 If you choose, you may answer.

5 THE WITNESS: There is a whole lot that

6 goes in to treatment for somebody who winds up in that

7 spot in life. And there are some people who are very

8 skilled and very able to help folks who end up

9 sexually abusing children, revisiting their own past

10 and things like that. But there is a diagnosis for

11 that, and it's pedophilia.

12 BY MR. DAVIS:

13 Q. I have bad hearing so when you mentioned that

14 the police had contacted you, who was the police

15 officer again?

16 A. Chuck Fleming.

17 Q. Chuck Fleming. And you met with him in

18 October of 2012?

19 A. Yes, sir.

20 Q. During the injunction hearing, you said that

21 you had not met with him until I think it was the

22 summer of 2013?

23 A. I met with him October 22nd, 2012.

24 Q. October 22nd. And you met with him and

25 RED :? Where was that meeting?

Page 35

1 A. In my office.

2 Q. Did you say that he said it hadn't been

3 appropriately handled or something?

4 MR. CRAIN: Objection.

5 THE WITNESS: He didn't say that.

6 BY MR. DAVIS:

7 Q. I couldn't understand when you all were

8 talking about it -- I have trouble hearing it.

9 What did he say then? What -- you said you

10 spent two and a half hours with him or something.

11 What --

12 A. He said that he would -- there was a

13 complaint, and that he was following up with the

14 complaint. And the complaint was that -- I believe it

15 was you who had called and said that the church didn't

16 appropriately handle a sexual abuse case.

17 Q. Did he tell you that the police had silenced

18 me in 2008, in July of 2008? Did the police officer

19 tell you that in your meeting?

20 A. No, sir.

21 Q. Did he tell you that we had been threatened?

22 A. No, sir.

23 Q. Did he tell you that we had been to the OPA

24 Department at the police department in 2009?

25 A. No.

Page 36

1 Q. Did you ever in your counseling or anything,

2 did you ever talk to Mark Robinson? His attorney?

3 A. I never talked to Wart.

4 Q. Did you ever talk to Jay Hager?

5 A. Yes. I've talked to Jay Hager, but I haven't

6 talked to Jay Hager about this case.

7 Q. Are you friends with Jay Hager?

8 A. I'm not.

9 Q. Where have you talked to him? I mean --

10 A. Well, he's another pastor -- he was another

11 pastor at the church, and so I would get referrals

12 from various pastors at the church.

13 Q. Did you talk to Jack Foster?

14 A. About this case?

15 Q. This case, or I mean, is that somebody you

16 know?

17 A. Again, he was a pastor at the church. He

18 would send me referrals as they would come in.

19 Q. So Covenant has used you a lot with other

20 people?

21 A. Sure, yes. They have sent me clients.

22 Q. Have they sent you any child sex abuse

23 clients?

24 A. Just this one.

25 Q. Did you ever talk to Sam Moore?

Page 37

1 A. No.

2 Q. Ever talked to anybody from the Billy Graham

3 Evangelical Association?

4 A. No, sir.

5 Q. The Covenant School?

6 A. No.

7 Q. Dr. Bill Campbell?

8 A. I don't know him. I have never talked to him.

9 Q. Chip Campbell?

10 A. I don't know him either.

11 Q. You used the word "creepy" about me. Could

12 you explain that a little bit more, why you have that

13 perception?

14 A. Because when I get calls or e-mails from

15 people external who say your picture and your voice is

16 on the Internet for anybody to see or hear, or I'm

17 getting repeated e-mails from somebody about me, it

18 just feels like an invasion of my own personal space

19 and privacy and the confidentiality of my clients.

20 That's why I used the word creepy.

21 Q. You said that there had been a lot of social

22 media about REDACTED .

23 Do you have an example of where anything has

24 been said specifically about RED ?

25 A. That right there. That exhibit right there

1 that you have.  
2 Q. I don't have -- oh, this exhibit?  
3 A. Yeah. That was me testifying about RED and  
4 it has RED 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.)  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 REPORTER'S CERTIFICATE  
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.  
15  
16  
17  
18 *Ariela Pastel*  
19  
20 ARIELA PASTEL, LCR  
21 Licensed Court Reporter (TN)  
22 LCR # 736 - Expires 6/30/19  
23  
24  
25

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

From: fmdshiloh@aol.com

To: chiefofpolice@nashville.gov <chiefofpolice@nashville.gov>; john.drake@nashville.gov <john.drake@nashville.gov>; john.cooper@nashville.gov <john.cooper@nashville.gov>

Cc: bill.lee@tn.gov <bill.lee@tn.gov>; herbert.slatery@ag.tn.gov <herbert.slatery@ag.tn.gov>; herb.slatery@ag.tn.gov <herb.slatery@ag.tn.gov>; billyb@covenantpres.com <billyb@covenantpres.com>; ben.ball@ag.tn.gov <ben.ball@ag.tn.gov>; Scarlett.Black@ag.tn.gov <Scarlette.Black@ag.tn.gov>; David.Findley@ag.tn.gov <David.Findley@ag.tn.gov>; councilmembers@nashville.gov <councilmembers@nashville.gov>; dhall@dcso.nashville.org <dhall@dcso.nashville.org>; chuck.fleming@nashville.gov <chuck.fleming@nashville.gov>; tom.west@nashville.gov <tom.west@nashville.gov>; cecil.vandevender@usdoj.gov <cecil.vandevender@usdoj.gov>; don.cochran@usdoj.gov <don.cochran@usdoj.gov>; chads@covenantpres.com <chads@covenantpres.com>

Sent: Tue, Sep 8, 2020 3:24 pm

Subject: 7th Message To Police Chief Drake - Tennessee Attorney General Herbert Slatery

Chief Drake: Below is the 2nd creepy photograph sent to me from Covenant Member Derek Blank's email account. I received a 3rd creepy photograph from Derek Blank's email account yesterday, in addition to a "legal counsel" threat from Matt Moore, Executive Director of Operations for Christ Presbyterian Church and Christ Presbyterian Academy on Sunday.

Attorney General Herbert Slatery possibly attends Christ Presbyterian Church along with Gov. Bill Haslam, Sen. Marsha Blackburn and Christ Pres Elder - MBA Father Gif Thornton. Gov. Bill Lee is a Christ Presbyterian Academy Alumni Father, along with other Christ Presbyterian Alumni Parents: 1) Protected child-molester John Perry; 2) Protected child sex abuse therapist witness Caroline Cone; 3) Protected DA star prosecution witness Scott Troxel who committed perjury with impunity to protect child-molester John Perry.

Attorney General Herbert Slatery and General David Finley provided me their Appellee response this weekend. At first glance, the Attorney General Appellee response is founded upon false information which should be corrected prior to any oral arguments before the Tennessee Court of Criminal Appeals (Case # - M2019-01852-CCA-R3-CD).

Attorney General Herbert Slatery and General David Findley deserve to have true and accurate information from the Nashville Police Department to protect the integrity of the Attorney General's Office by properly amending and correcting their Appellee response. See links and 2nd creepy photograph below. Austin Davis

<https://www.keepandshare.com/doc15/22272/2020-3a-sept-8-rise-of-a-titan-tennessee-attorney-general-herbert-slatery?da=y>

<https://soundcloud.com/valglenn18/herbert-slatery-speech>

<https://www.keepandshare.com/doc15/22244/2020-3-aug-29-scott-troxel-testimony-covenant-session-child-sex-abuse-cover-up?da=y>

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

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

From: Derek Blank <derekpblank@gmail.com>

To: fmdshiloh@aol.com

Sent: Wed, Aug 26, 2020 6:04 pm

Subject: Re: Nashville Police - BuzzFeed - Rev. Billy Graham Cover-Up



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

From: fmdshiloh@aol.com

To: chiefofpolice@nashville.gov <chiefofpolice@nashville.gov>; john.drake@nashville.gov <john.drake@nashville.gov>

Cc: derekpblank@gmail.com <derekpblank@gmail.com>; bill.lee@tn.gov <bill.lee@tn.gov>; ben.ball@ag.tn.gov

<ben.ball@ag.tn.gov>; mark.schoofs@buzzfeed.com <mark.schoofs@buzzfeed.com>; ben.smith@nytimes.com

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Subject: Nashville Police - BuzzFeed - Rev. Billy Graham Cover-Up