



A child sex abuse cover-up continued during the 2020 Belmont Presidential Debate.

October 22, 2020

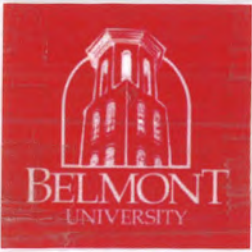


An Abused Belmont Student



Dr. Bryce Sullivan Belmont Dean

Will new Federal Judge William "Chip" Campbell, Jr., resign or be impeached?



A future Belmont student was 5 years old during the 2000 Presidential Election.



Gore Farm - 2000



ELECTION PM EXTRA

The Washington Post
 Wednesday, November 2, 2000

Presidential Cliffhanger Awaits Florida Recount

Gore 48,598,260 | Bush 48,356,049

Democratic Gains Trim GOP Majority

Clinton Edges Afl 'Net; Missouri Hires Governor

By Steve Delaney and Paul Fink
 Washington Post Staff Writers

WASHINGTON — The 2000 presidential election ended in a dramatic, and possibly decisive, way on Wednesday as Al Gore edged out George W. Bush in the Electoral College, setting off a recount in Florida and a series of legal challenges that could keep the White House in limbo for weeks.

Gore won 286 electoral votes, while Bush won 271. Florida's 25 electoral votes were the deciding factor, as neither candidate had enough to win outright. The results were announced after a long, tense night of counting votes in several states.

The Washington Post reported that Gore's victory was a narrow one, with a margin of just 23 electoral votes. The article also noted that Bush's lead in the popular vote was significantly larger than his lead in the electoral college.

The article further discussed the potential for a recount in Florida and the possibility of a Supreme Court decision to resolve the dispute. It also mentioned that Clinton had won a narrow victory in Missouri, and that the Missouri governor had been elected.

PHOTO: A woman looks on as the results are announced.

PHOTO: A group of people gathered around a table.

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CNN

CNN SPECIAL REPORT

BUSH VS. GORE: THE ENDLESS ELECTION

MONDAY, NOVEMBER 2 9P ET/PT

A child sex abuse cover-up also began in 2000.



A child sex abuse cover-up is now in progress before the Tennessee Court of Criminal Appeals: Case # M2019-01852-CCA-R3-CD



Sen. Gore **Future Belmont Student** **Belmont Father**



Oak Ridge 1959 **Sen. Kennedy** **Sen. Gore**

Oct 5, 2000 – Cheney vs. Lieberman Debate – Pauline Gore’s Birthday Party



Pauline Gore **Belmont Father**



Did former Belmont Board Member Bill Lee and new Federal Judge Chip Campbell inform President Trump about the child sex abuse cover-up at Belmont University?



**An Abused
Belmont
Student**

**Dr. Bryce Sullivan
Belmont Dean**



Attorney William "Chip" Campbell, Jr., protected child-molester John Perry during a child sex abuse cover-up further harming a Belmont student.

Dr. Bill Campbell



Sept 6, 2017 - Federal Judge Nominee William "Chip" Campbell, Jr.

An Abused Belmont Student



Sept 6, 2017 - Fed Judge Nominee Amy Coney Barrett



Oct 26, 2020 - Supreme Court Justice Amy Coney Barrett

Will The Tennessee Court of Criminal Appeals protect child-molester John Perry, Federal Judge Chip Campbell, and a Mann Act Federal cover-up crime.



Tennessee Court of Criminal Appeals judges are (seated from left) Norma McGee Ogle, James Curwood Witt, Jr., Presiding Judge Thomas T. Woodall, John Everett Williams, and Alan E. Glenn; (standing from left) Timothy L. Easter, Robert L. Holloway, Jr., D. Kelly Thomas, Jr., Robert W. Wedemeyer, Camille R. McMullen, Robert H. Montgomery, Jr., and J. Ross Dyer.



Federal Judge William "Chip" Campbell, Jr.

Case # M2019-01852-CCA-R3-CD

See two transcripts with Caroline Cone sworn testimony at the back of this document – Mann Act Federal Crime.



Sworn testimony provided by child sex abuse therapist Caroline Cone.



John Perry - Protected Child-molester

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

A Belmont father was wrongfully jailed twice. Attorney William "Chip" Campbell, Jr., was appointed as a Federal Judge.



Will Chip Campbell resign or be impeached?



Attorney Chip Campbell protected child-molester John Perry and represented the Nashville Presbytery in two child sex abuse cover-up cases won by fraud.



New Federal Judge William "Chip" Campbell won this child sex abuse cover-up lawsuit against a Belmont student by fraud to protect child-molester John Perry and a Mann Act Federal crime cover-up.

IN THE CIRCUIT COURT OF DAVIDSON COUNTY
AT NASHVILLE, TENNESSEE

FILED

2013 AUG -7 PM 3: 37

RICHARD R. ROSKER, CLERK

Chip Campbell D.C.

AUSTIN DAVIS and wife,
CATHERINE DAVIS; DAISY
DAVIS; D.D. b/n/f CATHERINE
DAVIS,

Plaintiffs,
vs.

Case No. **Redacted**
JURY DEMANDED



An Abused
Belmont
Student

COVENANT PRESBYTERIAN
CHURCH OF NASHVILLE; NASHVILLE
PRESBYTERY, P.C.A.; PRESBYTERIAN CHURCH IN
AMERICA (A CORPORATION); JIM BACHMANN;
JOE EADES; JOHN AVERY; WORRICK ROBINSON;
UNKNOWN DEFENDANTS.

Defendants,

AMENDED COMPLAINT

Plaintiffs complaining of Defendants, allege and say as follows:

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of August 2013, PLAINTIFFS' AMENDED COMPLAINT was served upon the following parties of interest by regular U.S. mail, postage prepaid, email, and/or fax as indicated below.

Thomas M. Donnell, Jr.
Autumn L. Gentry
Kelly M. Telfeyan
Fifth Third Center, Suite 1401
424 Church Street
Nashville, TN 37219
Attorneys for Covenant,
Joe Eades, Worrick Robinson,
John Avery, and Jim Bachmann
615- (Fax)
agency@

E. Michael Brezina, III,
Esq.
617 W. Main Street
P. O. Box 869
Knoxville,
Tennessee 37901-0869
Attorney for Presbyterian
Church in America
Fax:: (865)
mbrezina@

William Campbell
The Pinnacle at
Symphony Place, 150
3rd Avenue South,
Suite 1900
Nashville, Tennessee
37201
Attorney for Nashville
Presbytery
F: 615



William "Chip" Campbell, Jr.

This 7th day of August, 2013

[Signature]
DUNCAN CATES CAVE (BPR# 026235)
Attorney for Plaintiffs

Michael Brezina's sister,
Bonnie Brezina, was the
Iowa Field Director for
Huckabee 2016 Presidential
Campaign.



An Abused Belmont Student

Federal Judge William "Chip" Campbell, Jr. falsely accused a father of "harassment" as the Nashville Presbytery abused a future Belmont student.



William L. Campbell, Jr.

Member

615. (t)

615. (t)

ccampbelk

August 1, 2014

Via U.S. Mail and E-Mail

Duncan C. Cave, Esq.
230 4th Avenue North, Suite 300S
Nashville, Tennessee 37219
dcave

Chip Campbell won two cases by fraud during a Mann Act Federal crime cover-up which is still on-going.



Chip Campbell
Former Board Chair -
The Covenant School

Re: Austin Davis, et al. v. Covenant Presbyterian Church of Nashville, et al.
Davidson County Circuit Court Case No. : REDACTED

Dear Duncan:

Our client, Nashville Presbytery, was served recently with the Complaint in the referenced action. Pursuant to Tenn. Rule of Civ. Proc. 11, we request that your client dismiss his claims against the Nashville Presbytery in this case. If he fails to do so, we expect to file the attached Motion for Sanctions.

For the most part, the basis for this request is set forth in the draft Rule 11 motion for sanctions sent to you by the attorneys for Covenant Presbyterian Church of Nashville and Jim Bachmann. Additionally, this lawsuit appears to be based on the allegations that were asserted in the June 19, 2013 lawsuit (No. REDACT filed by your client in the Circuit Court of Davidson County. The dismissal of the claims in that lawsuit against the Nashville Presbytery has been confirmed by the Tennessee Court of Appeals. Regardless of whether that court allows for the rehearing that Mr. Davis requested, the fact remains that the claims in this lawsuit against the Nashville Presbytery mirror claims in that previous lawsuit. Further, based on your client's prolific communications about the subject matter of both lawsuits, it is clear that this latest suit was filed for in improper purpose with the sole intention of harassing the Nashville Presbytery and other defendants.

Page 2
August 1, 2014

In sum, Mr. Davis' claims against the Nashville Presbytery in the referenced lawsuit are not warranted under the law and were brought for an improper purpose. I trust that you will agree that this latest lawsuit should be dismissed and act accordingly. If not, we reserve the right to file the attached motion.

Respectfully,

William L. Campbell, Jr.



**Dr. Bryce Sullivan
Belmont Dean**

Belmont Dean Bryce Sullivan abused and banned his own Belmont student to protect John Perry and a Mann Act Federal crime cover-up.



On Friday, February 3, 2017, Molly Zlock <

wrote:



Dear Daisy,

My name is Molly Zlock and I am the Title IX Coordinator here at Belmont University. I received a report that I would like to discuss with you. Are you available today?

Thanks,

Molly S. Zlock, J.D.

Assistant Dean of Students and Title IX Coordinator

Office of Student Affairs

Belmont University

615.

molly. | titleix@belmont

From: Daisy Davis [mailto:
Sent: Sunday, February 05, 2017 11:16 AM
To: Molly Zlock <
Subject: Re: Report



**An Abused
Belmont
Student**

Hey Molly -

I hope you're having a great Sunday! I didn't see your email until this weekend or else I would've replied sooner. This week is really busy for me and Friday is my only day off. I have a hearing in court on Friday morning and I don't know how long that will last, but I will probably be free sometime in the afternoon (around 2). I could meet with you then. Let me know if that day works for you.

Also, is this report in regards to the incident with Dr. Bryce Sullivan?

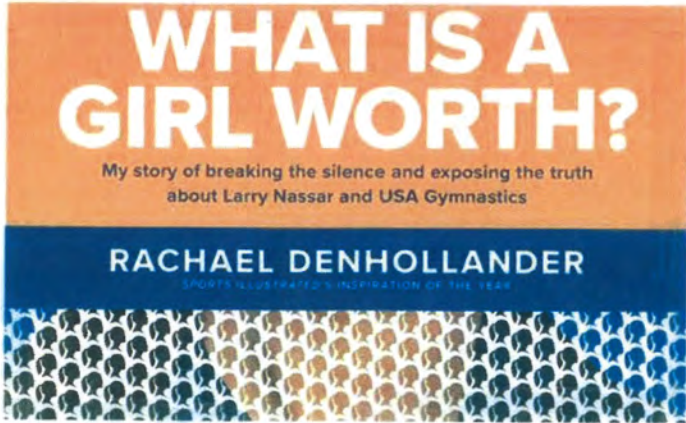
Thanks,

Daisy



Belmont Dean Bryce Sullivan saw no worth in one of his own Belmont students.

Do all molested girl victims have worth?



A very small excerpt from 24 pages of sworn testimony

5 THE COURT: All right. Ms. Davis, you
 6 can step up, raise your right-hand and be sworn.
 7 DAISY DAVIS,
 8 was called as a witness, and after having first duly
 9 sworn, testified as follows:

1 Q. Would you state your name?
 2 A. Daisy Davis.
 3 Q. And what are you doing at the moment?
 4 A. I'm a student at Belmont University.



Does Belmont Law School Dean Alberto Gonzales support Dr. Bryce Sullivan and the abuse of a Belmont student to protect child-molester John Perry and a Mann Act Federal crime cover-up?



ALBERTO GONZALES
DEAN, BELMONT UNIVERSITY COLLEGE OF LAW

ALBERTOGONZALES.COM

[@ARGONZALES](https://twitter.com/ARGONZALES)



Worrick Robinson
Belmont Law
Still A Covenant
Member?



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder



Did Belmont University learn anything from Penn State and Michigan State?



Belmont President Bob Fisher

SENTENCED

For their roles in the Jerry Sandusky child sex abuse case

 <small>Bob Fisher, AP Former VP for Business and Finance Lata Schick</small>	 <small>Bob Baker, AP Former Penn State President Graham Spanier</small>	 <small>Bobley J. Brown, AP Former Athletic Director Tim Curley</small>
Two months in jail and four months under house arrest \$5,000 in fines Serve 200 hours of community service	Two months in jail and the remaining time under house arrest Two years probation \$7,500 in fines Serve 200 hours of community service	Three months in jail and four months under house arrest \$5,000 in fines Serve 200 hours of community service

Penn State – Jerry Sandusky



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder



Worrick Robinson
Belmont Law
Still A Covenant
Member?



Michigan State – Dr. Larry Nassar



**Dr. Bryce Sullivan
Belmont Dean**

Does President Trump support the abuse of a Belmont student by Federal Judge William "Chip" Campbell, Jr. and Belmont Dean Bryce Sullivan?



Banned



**Federal Judge
Chip Campbell**

Sen. Bob Corker



Sen. Lamar Alexander

**Federal Judge
Chip Campbell**



Belmont Alumnus Peter Rosenberger is still supporting the abuse and banning of Belmont student to protect child-molester John Perry.



Peter Rosenberger – Long-time Friend of John Perry family

Gov. Mike Huckabee – John Perry’s co-author

“I love Covenant Church... I think if these people really knew the stuff that had been going on without their knowledge and consent it would horrify them... I would like for the truth to come out... Let people see what was really going on behind the scenes.”

Partial quotes from ex-Covenant Member Peter Rosenberger – The Tennessean – July 15, 2018 – Peter Rosenberger fled to Montana during the summer of 2018.



**Caroline Cone
Child Sex Abuse
Therapist – Witness**

1 CROSS EXAMINATION BY MR. DAVIS:

2 Q. Ms. Cone, did you say you had learned

3 about the child molestation in 2008?

4 A. Yes.

10 Q. So when in 2008 did you first start

11 counseling REDACTED

12 A. April.

13 Q. Or was it 2007, whenever it was?

14 A. It was 2008, and it was April.

15 Q. April. And so when the church calls you,

16 do you know who it was in the church that called

17 you?

18 A. One of the pastors.

19 Q. Do you remember who?

20 A. I believe it was Pastor Ferris.

21 Q. Pastor Larry Ferris? Pastor Larry Ferris

22 called you in April of 2008?

23 A. Yes, sir.

2008

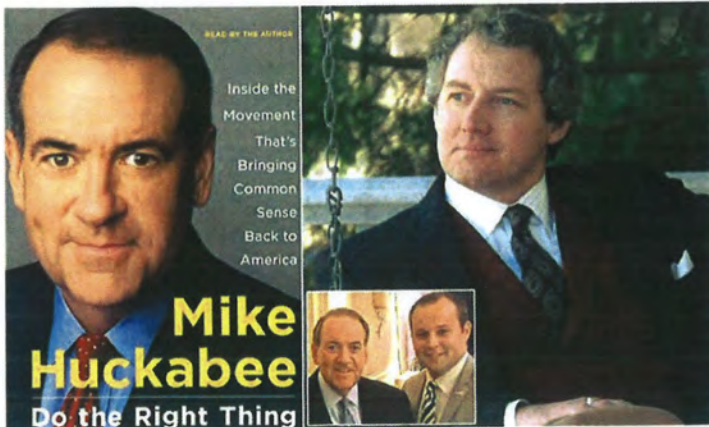
See two transcripts at the back of this document.

In an abundance of caution, the identity of Victim 1 is protected in submission to Larry Crain’s limited injunction request granted on Sept 24, 2018.



Pastor Larry Ferris fled to Easley, SC.

DID A "MANN ACT" FEDERAL CRIME COVER-UP BEGIN DURING THE 2007-2008 GOP PRESIDENTIAL ELECTION SEASON?



MIKE HUCKABEE I'M STANDING BY JOSH DUGGAR



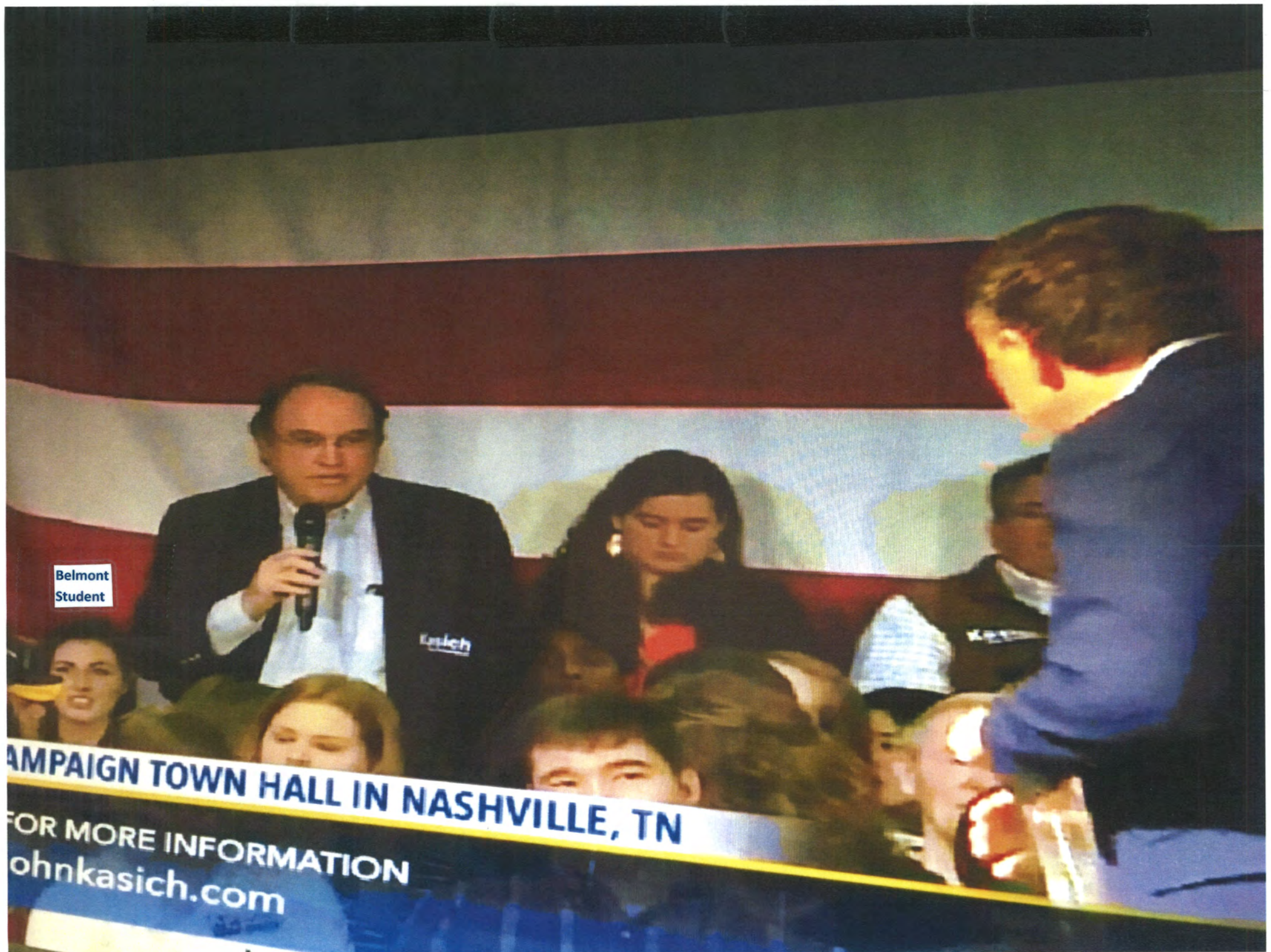
Presidential candidate **Mike Huckabee** is coming out swinging for **Josh Duggar**. Saying he stands by Duggar for his sin, he says the alleged molestation happened before he was a convicted sex offender.

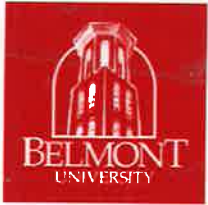
The former Arkansas Governor is fiercely tight with the **Josh Duggar** family, and made it clear during his campaign that the molestation investigation was unfair to Duggar. Huckabee says, "I don't believe what he was an underage boy did, or he should have himself," says Huckabee. "I don't believe, unfortunately, he and his family could walk it just like normal, and open about it with the writers and the audience."

Huckabee also stresses the **2006 investigation** should have been done during his time in office. He says the case is made the issue of being a child molester before being a convicted sex offender. "I don't believe it's fair."

Child Sex Abuse Cover-Up Case Before Tn Court of Criminal Appeals -Case # M2019-01852-CCA-R3

The "John Perry" child sex abuse cover-up continued during the 2016 Presidential Election.





A Belmont student was brave to testify about a child sex abuse cover-up connected to Presidential Politics.

**Nashville Courthouse
12 Sept 2017**





Three loving mothers were strong examples for a future Belmont student.



Pauline Gore



**Nancy Fleming
Banned Belmont
Grandmother**



**Catherine Fleming Davis
Banned Belmont Mother**



**Future
Belmont
Student**



**Nancy Fleming
Banned Belmont
Grandmother**

**Daisy Davis
Banned Belmont
Student**



A loving grandfather was a strong example for a future Belmont student.

FRONTLINE

interview: james fleming

You were still in school when you met Nancy's family? Describe Pauline Gore, if you will.

Pauline Gore? She would be my choice of a mother. I would rather have Pauline as a mother than any woman that I know right now. In my life. Pauline would be my first choice to be a mother. She was intelligent, interesting, loving, caring. She cared about us--that is, Nancy's friends. She truly cared about who we were, and what we were doing, and where we were going, and what our ambitions were; and what part she could contribute to our life. And she was anxious to introduce us to her friends and her way of life. A very unselfish woman; but very kind, considerate, and loving. I can't say enough good things about Pauline Gore.

Mrs. Gore was the ultimate in confidence, in a confident woman. She knew who she was, and she took great pride in who she was. There wasn't any doubt in Pauline's mind that she was a good person, a good mother, that she knew the right directions to send her children. She was right about religion; and she was right about her politics.

**Al Gore – James Fleming –
The Choice 2000 - Frontline - PBS**



Fleming attended Vanderbilt University in the mid-1950s with Nancy Gore, and he and his wife remained close friends with Nancy until her death. He paints an affecting portrait of Nancy Gore, as well as Albert Gore Sr. and Pauline Gore. He shares his impressions of the families' inner workings, and speaks about the relationship between Albert Gore Sr. and Al Gore Jr.



Future Belmont Student

Pauline Gore

A Belmont Adjunct Law School Professor scared a Belmont grandmother, mother, and future student to protect child-molester John Perry and a child sex abuse cover-up.



DECLARATION

Under penalty of perjury, I state that I am competent to make this declaration and that this declaration is based on my own personal knowledge as follows:

On July 6, 2008, when I went to the front door of Covenant's Building to pick up my 13-year old granddaughter, Daisy, there were two unfamiliar men standing with her.

On June 6, 2010, Daisy was desperate to end the shunning, harassment, and bullying she had endured at Harpeth Hall and elsewhere. Since no one was helping her, she wanted to return to Covenant to request an apology from Pastor Jim Bachmann with the hope that things might improve for her with other classmates who shunned her or were cruel to her. I agreed to go back to Covenant with her, my daughter and my grandson.

On August 8, 2010, I asked JIM BACHMANN after a Covenant service to apologize for mistreating my family as I had also done before. He threatened me with a lawsuit. This was in the lobby on a service on Sunday.

On August 15, 2010, Catherine, Daisy, Drew and I went to Covenant for a Sunday service. As we approached the sanctuary, we saw a Metro Police car parked in front of the entrance and it scared us.

On August 22, 2010, after church at Covenant, WORRICK ROBINSON actually chased after me in the parking lot. I told him to leave me alone because I was afraid of him. He also chased Catherine and Daisy who were with me.

On August 29, 2010, three men ran to block me, Catherine and Daisy at the front entrance of the Covenant sanctuary telling us we could not go inside. They were Tom Pulliam, Lee Bryant, and Herb Kneeland. I took out a piece of paper and wrote down their names. Daisy



**Worrick Robinson
Belmont Adjunct Law
School Professor**



slipped by. Tom Pulliam eventually said we cannot stop you from going in, so we did. We left the service without speaking to anyone.

Date: August 7 2014

Nancy S. Fleming
Signature

NANCY S. FLEMING
Printed Name



A banned, bullied and molested Belmont student was brave to stand up for herself after her lawyer withdrew from the case.

From: Daisy
Date: October 28, 2015 at 1:26:42 AM CDT
To: Redacted
Cc: Redacted
Subject: Re: Davis v. Harpeth Hall

Mr. Redacted

Never received.

First of all, if the deposition is going to be video taped or recorded, I would like a copy of it once we are finished.

In our meeting, Mr. RED and Redacted made it clear that this process was going to be brutal and tough for me to endure. I knew y'all would come after me financially, as Redacted did the other day. I knew you would try to wear me down emotionally and take advantage of the fact that I don't have a lawyer so that I would quit.

I get it. This is your job. You want to make enough money to take nice family vacations and to have a favorable reputation in the community. Your family is not being lied about to police and you don't have to scrape dimes off of the car floor to pay for enough gas to get home.

John Wayne once said, "True grit is making a decision and standing by it, doing what must be done. No moral man can have peace of mind if he leaves undone what he knows he should've done."

You have the choice to treat girls how you feel is necessary when doing your job. I have the choice to chase justice for all of the bullied girls who have been told that they are "overreacting" or "just going through a phase". There are little girls today that are naively seeking approval from older men online because they don't have friends in school and feel lonely on Friday nights. There are girls cutting themselves with razor blades on the floor of the shower, sobbing in a pool of their own blood because they have been convinced that they are the problem. I have the choice to either let them suffer or give them hope and show them that their lives mean something by standing up for myself.

10 years ago I was crying myself to sleep, begging God to give me a chance to wear a plaid skirt. Those prayers left me with a reputation smashed by lies and no will to live. What else could Harpeth Hall possibly do to hurt me? They killed my childhood dream and then sent you guys to finish me off. Let's just get this thing over with.

I will see you men on Thursday.
Daisy



A Belmont student was brave to speak out during a Mann Act Federal crime cover-up to protect child-molester John Perry.

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

From: Daisy Davis ·
To:
Sent: Sun, Nov 15, 2015 2:58 pm
Subject: Fwd: Important Update - Please Read

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.

Hi all -

My name is Daisy Davis. I'm not used to writing emails, but for all of you who have been following the child molestation coverup at Covenant, I wanted to take a chance to update you.

This morning around 11:30, Austin Davis, my unarmed father, was falsely accused and arrested. He was taken downtown to be prosecuted and jailed by Metro Police. I was told that REDACTED also went to the court to prosecute him. The child molester, however, has still yet to be prosecuted although it appears that the statute of limitation on his history of sexual abuse has not yet expired.

If the paying members of Covenant are the rightful property owners, and not the church's leadership team, then the members are in charge of important decisions being made about the property. They deserved to vote before any action was taken against my dad. There should've been a congregational meeting that allowed for all member's questions to be answered in detail. The information provided to the members should have included that John Perry confessed the child molestation, that he was not prosecuted, and that he was allowed to remain a member after he confessed. They also needed to address whether he abused other children while he was running a safe house and if he was prosecuted for sexually abusing them. The church leadership also needs to explain why my dad is a "threat" for informing people of the coverup if his fact-based allegations are proven to be correct. The child molester in Belle Meade needs to be properly prosecuted before a guy just trying to go to church is.

It's easy to write off my dad. He has been ostracized and lied about by the community. It's easy to write off his 20 year old daughter, too. It was easy to write off the sexually abused victim when RED sought help. It's easy, but is it right? Easy silences and undermines, but doing the right thing empowers and protects. Redacted = RED

For those of you who don't want to get involved, I understand. It's messy and it's hard to be brave when your social status is at stake. Maintaining a good reputation can be done if you are willing to lie, cheat, and steal to keep it. Reputation means having a good PR team, but character means having a good track record.

There are people my age looking up to adults to see how they will react in the face of injustice. Our generation is just as scared as you all are, if not more so. We see violence and corruption at every turn and we crave hope and true leadership. We want to see our mothers and fathers take a stand. We want to know that if we live with integrity and pursue the truth, then evil will not prevail and our bravery will be rewarded. Our generation needs more heroes to admire, not cowards.

When I was little I read a book about a girl whose father takes a stand for justice. The town she lives in shames him and settles for the lies because the community is too lazy, too scared, or too intolerant to concern itself with the truth. There is a line from the book that says that it's a sin to kill a mockingbird. I always thought that line meant that it's wrong to take away someone's innocence. However, after today, I have a different point of view. Mockingbirds' songs reflect the world around them. They sing the truth they find in their surroundings. Maybe what Harper Lee was trying to say is don't shoot the messenger.

I am proud of my dad. He is my hero and I will stand by the truth with him.

Please feel free to email me if you have any questions and thank you for keeping my family in your prayers.

Have a happy Sunday,
Daisy



A small sample of unkind responses sent to a Belmont student.

From: **Redacted.**
Date: Mon, Nov 16, 2015 at 9:41 AM
Subject: Re: Important Update - Please Read
To: Daisy Davis

I don't care about you, your crazy father. He's mentally ill. Furthermore, if you **RED** contact me again I'LL SUE YOU FOR HARRASSMENT

From: **Redacted.**
Date: Sun, Nov 15, 2015 at 4:28 PM
Subject: Re: Important Update - Please Read
To: Daisy Davis <

Daisy,

The child molester was excommunicated from the church. His victim did not want the world to know, so **RED** alone decided not to prosecute. **RED** has since gone to live with **Redacted..** Why are you still so concerned??? It's not your families business. As AA they say, "stay on your side of the street".

Your "hero" needs help. He's OCD on the past. There are plenty of other churches in "the city of churches" to worship in, to pray for peace and peace within himself. He's tried to intimidate my church and other institutions for years. Does he hold down a paying job?

Your father's not allowed on my church property, so why the big surprise of the arrest? Obviously, He craves attention.

You have violated my church and my privacy. You are being used by your mentally ill father. He needs help. I have doctors names and counsellors names for you, your mother and brother, when you're ready for them.

May the Peace that passes all understanding be with your family,

Redacted.



Belmont University issued a written warning to a Belmont student who was brave to speak out about a child sex abuse cover-up.

From: **Janelle Briscoe** ✓
Date: Tue, Sep 13, 2016 at 2:43 PM
Subject: Using Belmont email for personal use
To: "[daisy.davis](#)"



Hello Daisy,

It has been brought to my attention that you sent the below email from your Belmont account. Per the Bruin Guide (Student Code of Conduct) on page 81 under *Email Privacy*, Belmont emails are to only be used for academic or employment use, not for personal use. This email will serve as a written warning, the next violation will result in your participation in the adjudication process for violating the Use of Internet and Computer Resources policy. Thank you.

From: Daisy Davis <
Date: September 10, 2016 at 12:53:58 PM CDT
To: '
Subject: 12e - A Letter To Harpeth Hall Alumnae From Daisy Davis

Excerpt

Dear Harpeth Hall Alumnae,

My name is Daisy Davis and I am a former member of the class of 2013. I grew up in Nashville where I attended Harpeth Hall from 5th grade until my Junior year. My late grandfather was Dr. James Fleming, and my grandmother is Mrs. Nancy Fleming. My mother is Catherine Fleming Davis who graduated in 1979. A more distant relative in my family was Ms. Martha Corwin Gregory who helped write the Harpeth Hall Alma Mater with the help of some of her students.

Caroline Cone Sworn Testimony: <https://soundcloud.com/valglenn18/child-sex-abuse-therapist-caroline-post-court-partial-testimony-march-14-2016>

If you have questions, stories, or thoughts you wish to express, please feel free to talk to me.

Love,
Daisy Davis

Cell:
Email:

Janelle Briscoe
Director of Community Accountability

(phone)
(fax)

*"The ultimate measure of a man is not where he stands in moments of comfort and convenience, but where he stands at times of challenge and controversy."
-Dr. Martin Luther King*

Drew Davis December 6, 2013

I am currently preparing for exams and I have to make this briefer due to lack of time. If the court needs more information, I will be glad to elaborate.

I was nine when my family was stopped at the doors of Covenant. My parents did not tell me very much about their problems because they did not want me to worry. Worrying is something I'm very good at. When we reached the entrance there were about five or six men blocking the door. They began to ask my dad questions. Although my dad warned me he may be kicked off church grounds I was still shocked. I was allowed to enter, and Pastor Jack Foster proceeded to apologize to us, saying they didn't want to do anything to my dad but they had no choice. I was very confused because I did not see my dad as a bad person. After the experience, I began to question the integrity and moral values of the church and police.

A few days later, my dad and I were at J. Alexander's. While we were ordering, my mom called and said there were cops at our house. When we got to the house, the two cops at our door were very nice to me, but the frightened look on my mother's face told me they were not my friend. Assuming the church had sent

2

them, I decided that Covenant was an evil place with bad intentions. I no longer felt safe around the police.

After all this was done to our family, we started hearing people say that my dad was crazy and dangerous. When I was in sixth grade at an MBA football game, a friend from my old school pulled me to the side of the crowd of kids and told me a girl who was a member at Covenant was telling people that my dad is a crazy man who writes untrue letters to the members. I felt embarrassed and angry. This incident made me very cautious and aware of the members and some of the old friends at the church when I saw them in public. I thought nothing would ever be the same.

My sister was hit much harder than I was by the church. Through middle school, I did not receive as much negativity as Daisy, who was completely ostracized. Daisy lost virtually all of her friends, and soon became a completely different person. She was always locked up in her room during the day, and she would have intense altercations with my parents literally every night. I was scared of what she may have done to herself or to my parents. She would sometimes leave suicide notes, and she would run

away from home. My sister, who was once the happiest person in the room, became someone completely different. It felt like having a stranger sleep in the room next to you.

The events that occurred since that day at the church have made me feel scared of the police, mad at the church, confused of right and wrong, and embarrassed of my family's "crazy" reputation. I have second degree bullying effects. As my sister was bullied, I felt the same way as I watched her cry and scream at night. Most nights I would sleep on the floor of my parents room because I was afraid of Daisy, and I was afraid of someone trying to hurt my family. I used to double check the locks on the doors every night.

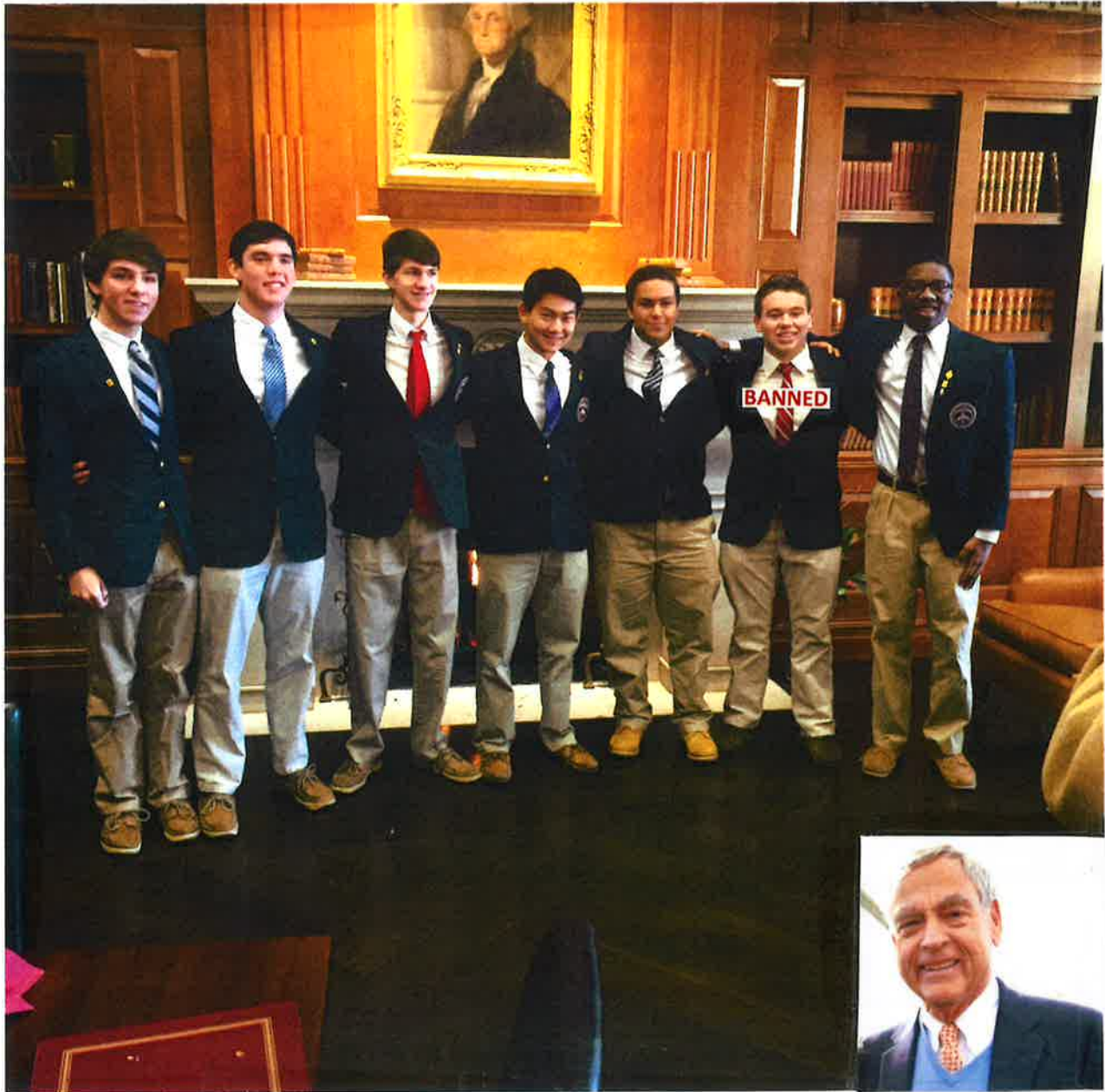


Banned Belmont
Brother

Banned Belmont
Grandmother



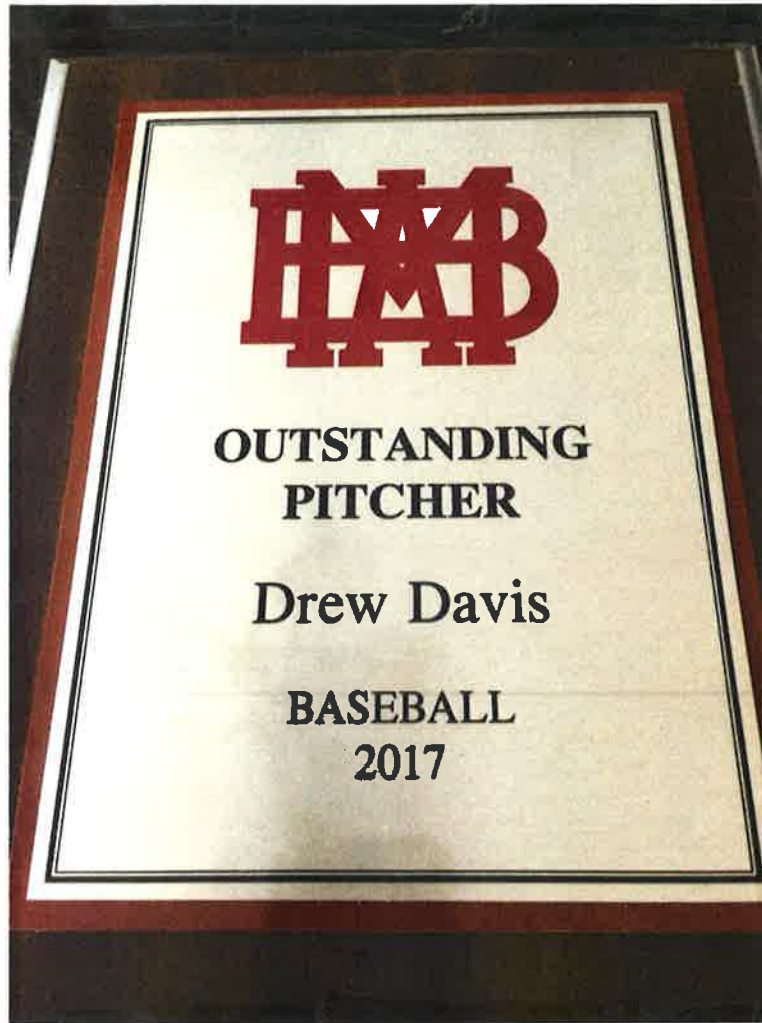
A young Belmont brother was banned from contact with the MBA Martin Luther King society.



**Jake Wallace –
MBA Board –
Covenant Elder**



A young Belmont brother was banned during his senior season of MBA baseball.





A young Belmont brother was banned from contact with R. A. Dickey and MBA baseball teammates and coaches.





A young Belmont brother was banned from contact with the MBA community.

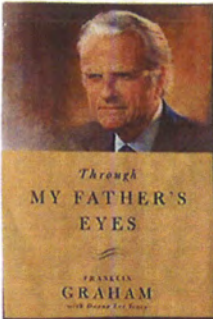


David Ingram

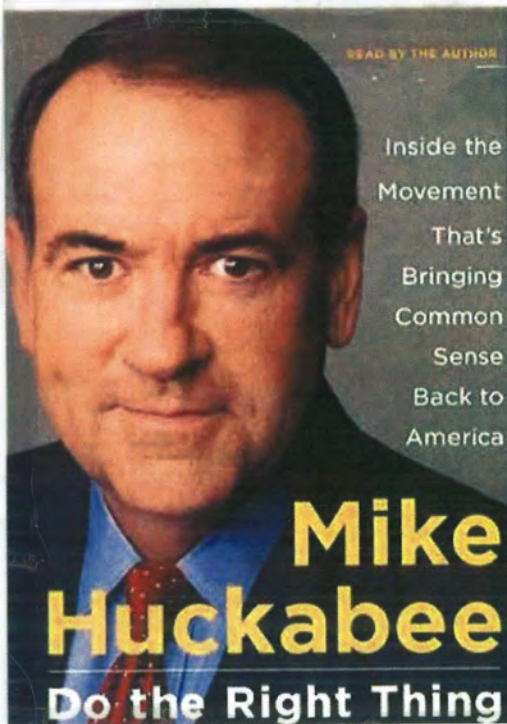
Brad Gioia

Jake Wallace –
MBA Board Member
Covenant Elder

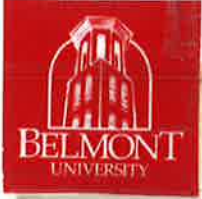
A Belmont father was arrested to protect child-molester, John Perry, on Oct 20, 2017.



UNLAWFULLY JAILED – 18 DAYS



JOHN PERRY



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder



Worrick Robinson
Belmont Law
Still A Covenant
Member?



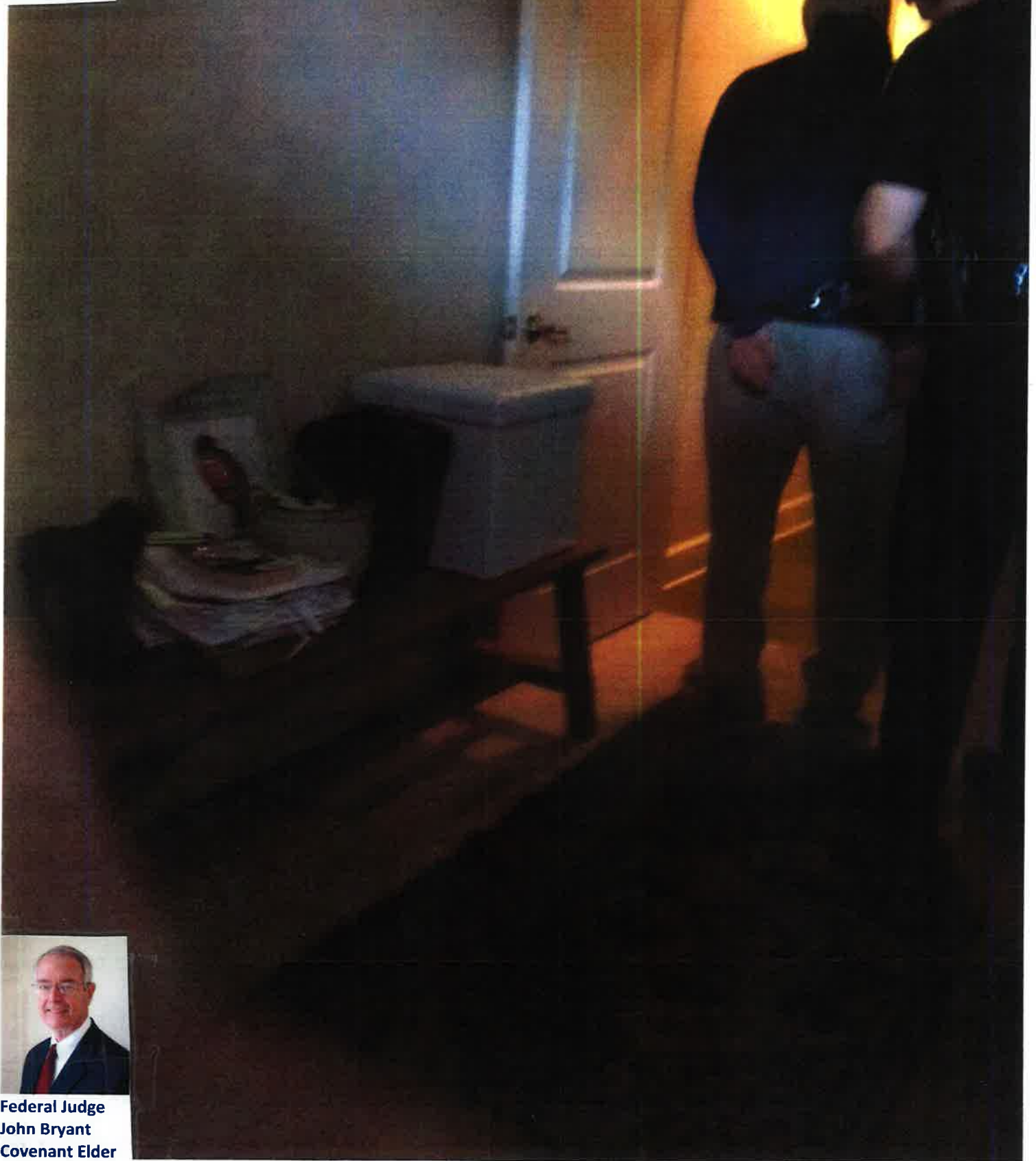
Daisy Davis –
Abused Belmont
Student



Oct 20, 2017 – Belmont Father - 2nd False Retaliation Arrest – Jailed 18 Days



**Dr. Bryce Sullivan
Belmont Dean
Covenant Elder**



**Federal Judge
John Bryant
Covenant Elder**



A Belmont father was wrongfully jailed for 18 days to protect child-molester John Perry and a Mann Act Federal crime cover-up.



Willie
Austin
Daves
940950
ORC-UNIT B
OCT 20 - NOV 6 2017
RELEASED BY JUDGE CHERY
BLACKBURN

Church of Another Chance

Because from the darkness we can take flight



Offender Re-Entry Center
November 2, 2017



Senior Pastor: Scott Jameson
Associate Pastors: Max Haskett, Tai Krupp
Worship Leader: Jordan Linshead
www.ChurchOfAnotherChance.org





**Dr. Bryce Sullivan,
Belmont Dean
Covenant Elder**

Did Belmont Dean Bryce Sullivan abuse and ban a Belmont student to protect the "heinous sin" of John Perry and Pastor Jim Bachman?

TO: Shepherding Committee of The Nashville Presbytery
FROM: The Below Signed Members
CC: Members of Covenant Presbyterian Church
Date: November 22, 2015

May 22, 2014

Bryce's report to the session following the meeting with the pastors did not reflect that some or all of the grievances against Pastor Jim were petty and personal in nature. The report also failed to provide a perspective on the nature of the "sex claim."

July 21 2014 Monday

All told the committee conducted 18 interviews from July 28-August 9 over 168 hours. Among those interviewed were 7 pastors, 7 ruling elders 1 inactive ruling elder, 1 deacon, and 1 member.

The resolution was signed by:

Elder Emeritus

Joe Eades
George Vander Woude, Jr.
Clarence Sutherland
Sam Moore
Jake Wallace
LeRoy King

Inactive Elders

Ron Carter
Jim Spann
Bobby Lowe
John Avery

Active Elders

Dale Lowelling
Charlie Fentress

Nov. 10, 2015

Presbytery meets in Tullahoma. Covenant pastors and elders including Herb Kneeland and Bryce Sullivan (a total of 7 people) travel to Tullahoma to meet with Presbytery and Shepherding Committee to testify.

Nov. 14, 2015 Saturday

During the meeting, Elder Jack Bailey said, "The charges against Jim Bachmann are serious. They include lying, schism, moral failure, and heinous sin."

The Session voted to approve the Shepherding Committee's recommendation to relieve Pastor Jim from preaching, teaching, and leading worship (vote was 13 to 8).

Nov 15, 2015 (Not included in report provided to the Nashville Presbytery)

A Belmont father was falsely arrested at a public Sunday church service to protect child-molester John Perry and a Mann Act Federal crime cover-up.



**New Federal Judge Chip Campbell -
Nashville Presbytery Attorney in 2
child sex abuse cover-up cases won
by fraud.**



**John Perry
Heinous Sin**



**Pastor Jim Bachmann
Heinous Sin?**

**Did Nashville Presbytery attorney
Chip Campbell attend this Nashville
Presbytery meeting?**

**Jack Bailey -- Former
Chief of Staff for
Missouri Rep. Todd
Akin.**



How many child-molesters is Belmont Dean Bryce Sullivan protecting?

PCA Pastor Mike Sloan – Internal PCA Document

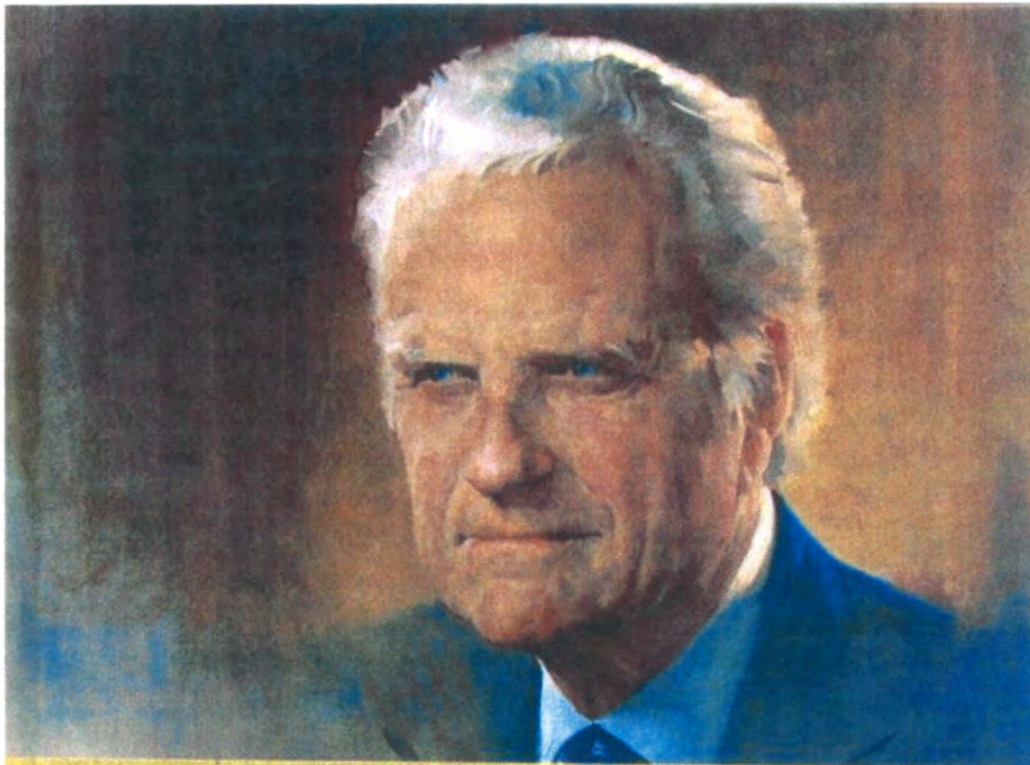
1 I know an RUF campus pastor who is currently ministering to seventeen students who were
2 victims of child sexual abuse. Not seventeen over the life of his ministry – seventeen current
3 students in his RUF chapter. Let that sink in for a minute.
4
5 I know two pastors who have had their daughters sexually assaulted in the PCA churches
6 they were serving at the time. One of my best friends knows a man who was found to be
7 serially molesting his own granddaughter. This man is a long-time PCA member and has
8 been a leader in Bible Study Fellowship. I could tell you many other stories of abuse from
9 people I know personally.
10
11 I know of multiple cases where the PCA church did not report the abuse. One of the two
12 PCA pastors I mentioned, the elders and the pastor at the time knew about the abuser was
13 guilty of child rape but did not call the authorities. When my friend was called to come
14 pastor the church he knew something was not right in the church, but before he could figure
15 it out his own young daughter was sexually assaulted by the same abuser.
16
17 Dr. Diane Langberg told me this story personally. Several years ago the then current head of
18 woman's ministry in the PCA was talking with Dr. Langberg about child sexual abuse. She
19 said to Dr. Langberg, "I'm so glad we don't have this in the PCA." Dr. Langberg told her at
20 her next women's ministry conference to list child sexual abuse as an issue faced by women
21 and see what happens. She said don't even mention it, just list it in one of the handouts. A
22 few months later the head of women's ministry called Dr. Langberg and said, "What do I
23 do? They are coming out of the woodwork!"



Dr. Bryce Sullivan
Belmont Dean



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



Through
MY FATHER'S
EYES

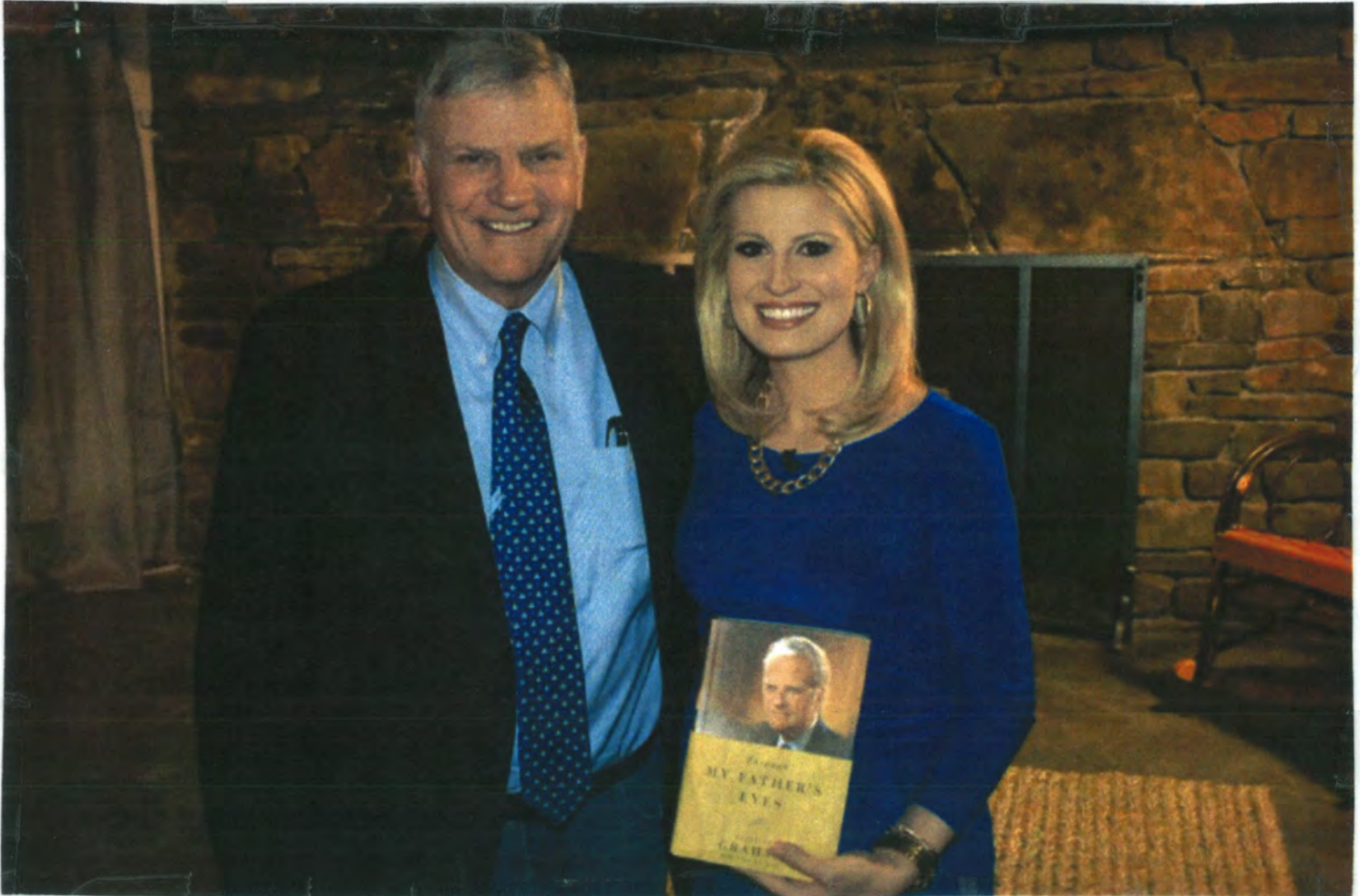


FRANKLIN
GRAHAM
with Donna Lee Toney



Did child-molester, John Perry, write most or all of Rev. Billy Graham's biography: "Through My Father's Eyes?"

John Perry vs. HarperCollins Publishing, Inc. – Federal Case # 3:18-cv-00416



20. During this time frame in 2007, Mr. Perry formed a working relationship with Franklin Graham. He regularly sent sections of the rough manuscript to him, solicited his review and comment, and asked his staff for specific information. In all of his meetings and conversations with Franklin Graham, Mr. Graham expressed nothing but praise and encouraging comments about Mr. Perry's work. When the Billy Graham Library opened in the spring of 2007, Franklin Graham invited Mr. Perry to attend, and when he arrived, broke away from the group he was with, and made a point of welcoming Mr. Perry to the event.



Child-molester John Perry had a book proposal agreement with Jay Sekulow's ACLU organization in March 2012.



Larry Crain - Protected Child-Molester John Perry's Attorney

Jay Sekulow - President Trump's Impeachment Attorney

Jay Sekulow was President Trump's impeachment attorney. Jay Sekulow is a long-time friend and legal colleague with attorney Larry Crain who won a \$2.1 million judgment against Austin Davis.



Did John Perry ghostwrite a book for Jay Sekulow and the ACLU? Does Jay Sekulow support "private" child sex abuse, child-molester John Perry, and the \$2.1 million "default" judgment against a Belmont father?

Collective Exhibit 1

FILED

WORK - MADE - FOR - HIRE AGREEMENT

NOV 28 PM 2:06 RICHARD H. ROOK, JR. CLERK

[Signature] D.C.

AGREEMENT made this fifth day of March, 2012 made between American Center for Law and Justice (hereinafter "Author"), whose principal address is Regent University Drive, Virginia Beach, Virginia 23464, and John Perry (hereinafter "Writer") whose principal address is P.O. Box Nashville, Tennessee 37215.

IN WITNESS WHEREOF, the parties mutually agree as follows:

- 1. The Writer agrees to write a proposal (hereinafter "Proposal") which will be developed from the material provided to the Writer from the Author including related writings (such as Shariah Law: Radical Islam's Threat to the U.S.) and personal interviews (with Miles Terry and Jay Sekulow), and is tentatively titled, Shariah (hereinafter "Work"). The Proposal shall include an Overview, Table of Contents, and a Sample Chapter. The Author and the Writer agree that they will work together to create and finalize the Proposal by April 1, 2012.

Child-Molester John Perry's Attorney Larry Crain



Jay Sekulow - President Trump's Russian - Ukraine Lawyer



John Perry - Protected Child-Molester - Christ Presbyterian Academy Alumnus Parent

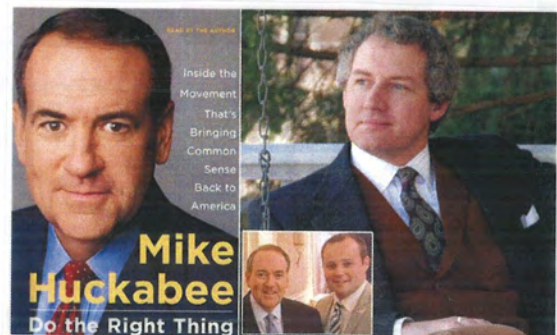
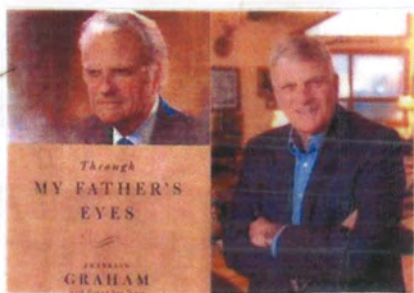
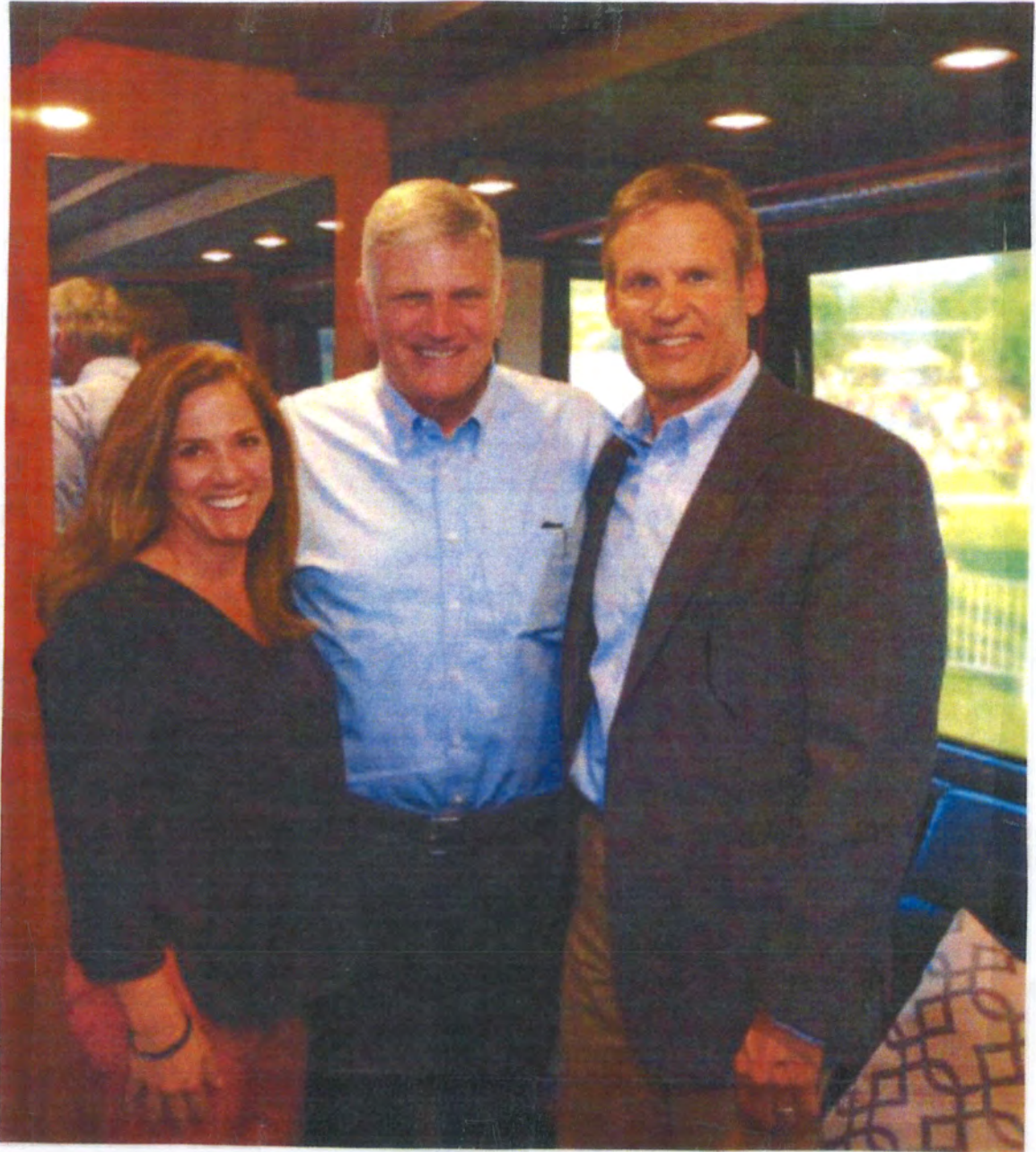
Ex-Mrs. John Perry Stephens Valley Church



Why did Susan Ann (Perry) Clark appear in court with Larry Crain against Austin Davis? Larry Crain is child-molester, John Perry's, attorney.



A Belmont student provided Belmont Board Member Bill Lee rock-solid information about a child sex abuse cover-up to protect John Perry?





A Belmont student is still waiting on Gov. Bill Lee's policy team to follow up.

From: Bill Lee <bill@_____.>
Date: Sat, Jul 28, 2018 at 10:35 AM
Subject: Re: As you travel to Memphis
To: Daisy Davis

Daisy,

It was great to meet your dad, I am grateful he took the time to come out and listen to my vision for our state. **Thank you for the info, I'll be sharing it with my policy team.**

Thanks for the note.

Oct 21, 2020 – Still waiting on a response from Gov. Lee's policy team.

-Bill

On Thu, Jul 26, 2018 at 1:59 AM, Daisy Davis <_____.>
Hi Mr. Lee -

> wrote:

I'm sorry to write you so late. I would've written you earlier, but I just got home from work. My name is Daisy Davis and I am a rising senior at Belmont University. My father, Austin Davis, enjoyed meeting you and your wife at the Corner Pub the other day. My dad graduated from Memphis University School and still has many MUS/Ole Miss friends in Memphis. I hope you can take a few minutes to look at this information (provided in the links below) as you travel to Elvis' hometown. If you have any questions please feel free to contact me.

Have a safe trip and enjoy some good BBQ!

God bless,

Daisy

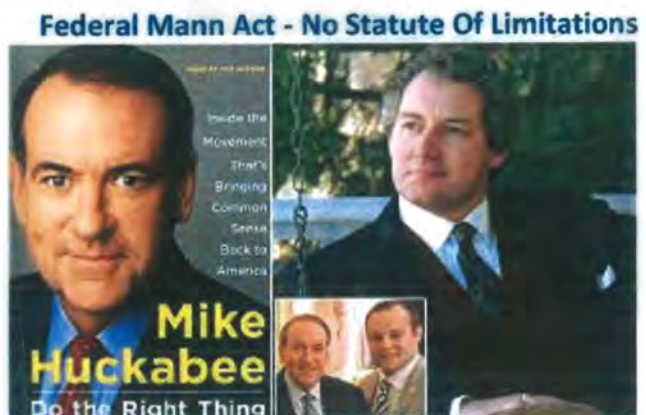
<https://www.keepandshare.com/doc/11/25319/2018-1w-july-22-the-silent-bell-part-14-combined-for-bl?da=y>

<https://m.youtube.com/watch?v=hhYXcaW4Eps>

It is never too late to do the right thing.



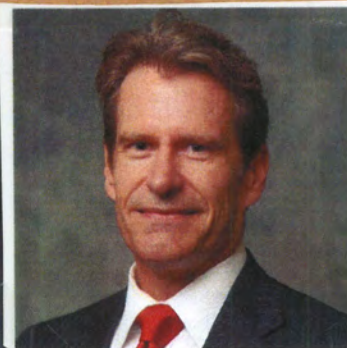
IS GOV. BILL LEE STILL ON THE BELMONT BOARD?



John Perry Protected Child-Molester



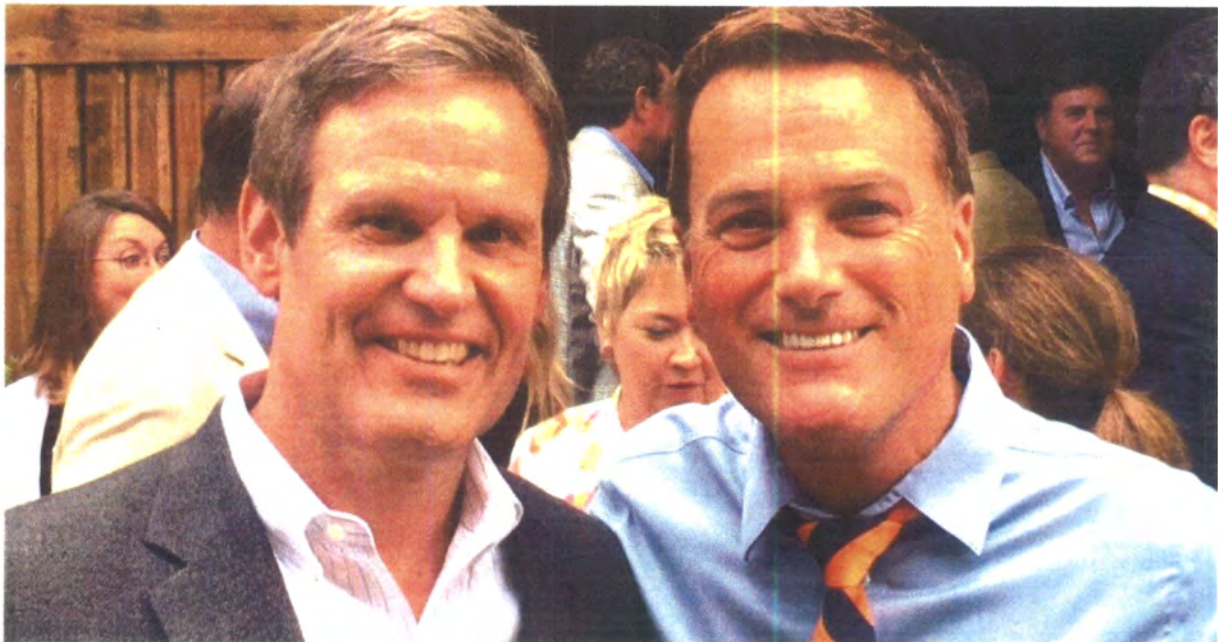
Does former Belmont Board Member Bill Lee support Belmont Dean Bryce Sullivan's abuse of a banned Belmont student?



**Dr. Bryce Sullivan
Belmont Dean**



Does former Belmont Board Member Michael W. Smith support Belmont Dean Bryce Sullivan's abuse of a banned Belmont student-graduate?



Tennessee Gov. Bill Lee

Michael W. Smith

Does Michael W. Smith support "private" child sex abuse in Tennessee?



Belmont Dean Bryce Sullivan banned, bullied and gaslighted a Belmont student to protect child-molester John Perry.

BELMONT UNIVERSITY

Students Faculty & Staff Parents Alumni Community Give

About Academics Admissions Athletics Campus Life Events Spiritual Life

Bryce Sullivan

College of Liberal Arts & Social Sciences

- Academic Departments
- Faculty & Staff
- Why Liberal Arts and Social Sciences at Belmont?
- Undergraduate Programs
- Graduate Programs
- Undergraduate Research
- Co-curricular Learning
- Belmont Lit Journal
- Humanities Symposium
- Pre-Law at Belmont
- Dean's Office Staff
- CLASS Seminars



Bryce Sullivan, Ph.D., is Professor of Psychology and Dean of the College of Liberal Arts and Social Sciences at Belmont University. He was appointed Dean in 2008, following seven years as Chair of the Department of Psychology at Southern Illinois University Edwardsville. He is currently serving as Interim Chair of the Department of Education in addition to his dean responsibilities.

Dr. Sullivan received his B.S., *summa cum laude*, from Georgia State University, and his M.A. and Ph.D. from The Ohio State University. His publication record includes 15 peer-reviewed journal articles, 4 book chapters, and 36 conference papers. Dr.

Sullivan's scholarly interests include higher education, clinical psychology, and ethics in psychology. His teaching interests include personality theory and clinical psychology. He is a licensed clinical psychologist (license granted in Illinois), but all of his professional activities are currently devoted to his role as Dean.

At Belmont, Dr. Sullivan's teaching has included a First Year Seminar classes titled "Christianity and the Life of the Mind," a class on Exercise and Stress Management, and the Senior Capstone class. He is a licensed clinical psychologist (license granted in Illinois), but all of his current professional activities are devoted to his roles as Dean of the College and Interim Department Chair in Education.

He is an elder at Covenant Presbyterian Church in Nashville.





Dr. Bryce Sullivan
Belmont Dean
Covenant Elder

Belmont Dean Bryce Sullivan participated in and still supports the abuse and banning of a Belmont student to protect child-molester John Perry.

DICKINSON WRIGHT PLLC

424 CHURCH STREET, SUITE 1401
NASHVILLE, TN 37219-2392
TELEPHONE: (615)
FACSIMILE: (615)
<http://www.dickinsonwright.com>

AUTUMN L. GENTRY
AGentry
(615)

November 17, 2015

VIA EMAIL & U.S. MAIL

Ms. Daisy Davis

Nashville, Tennessee
belmont.edu



Belmont
Student

Re: Prohibition from Covenant Presbyterian Church of Nashville ("Covenant")
Property

Dear Ms. Davis:

This firm has been retained by Covenant Presbyterian Church of Nashville ("Covenant") regarding the matters set forth herein. This letter serves as notice to you that due to the actions and disruptive behavior you demonstrated immediately outside the sanctuary during Covenant's late worship service on Sunday, November 15, 2015, you do not have the permission or the consent of Covenant to enter upon or otherwise remain on the property owned by Covenant located at 33 Burton Hills Boulevard, Nashville, Tennessee (the "Property"). As a result, you are prohibited from returning to the Property at any time whatsoever, regardless of the day of the week or the time of day. **This prohibition is in effect 24 hours a day, 7 days a week.**

In the event that you ignore this letter, Covenant will immediately notify law enforcement to remove you from the Property and arrest you for criminal trespass and for any other violations of Tennessee law. Although not required to enforce the Tennessee criminal trespass statute, Covenant has filed an Authorization to Enforce & Prosecute Criminal Trespass Violations ("Criminal Trespass Waiver") with law enforcement to expedite your arrest should you return to the Property.

We hope that you will choose to voluntarily comply with this letter and Tennessee law.

Sincerely,

Autumn L. Gentry

ALG/lac



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder

DICKINSON WRIGHT PLLC

Belmont Dean Bryce Sullivan participated in and still supports the abuse and banning of a Belmont mother to protect child-molester John Perry.

424 CHURCH STREET, SUITE 1401
NASHVILLE, TN 37219-2392
TELEPHONE: (615)
FACSIMILE: (615)
<http://www.dickinsonwright.com>

AUTUMN L. GENTRY
AGentry
(615)

November 17, 2015

VIA EMAIL & U.S. MAIL

Mrs. Catherine Davis

Nashville, Tennessee

Re: Prohibition from Covenant Presbyterian Church of Nashville ("Covenant")
Property

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We hope that you will choose to voluntarily comply with this letter and Tennessee law.

Sincerely,

Autumn L. Gentry

ALG/lac



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder

Belmont Dean Bryce Sullivan protected John Perry and a child sex abuse cover-up while a Belmont grandmother passed away banned and defamed in Nov 2016.



**COVENANT
PRESBYTERIAN
CHURCH**

.....
S. James Bachmann, Jr.
Senior Pastor

August 17, 2010

Dear Nancy,

The Session of Covenant Presbyterian Church hereby provides notice that you are no longer allowed to attend our worship services or other church events. After many years of meetings, emails, and letters we regret that our differences are irreconcilable and your presence and accusations are no longer tolerable.

Because you have clearly stated that your purpose in attending is to hear a public apology from our senior pastor, and because no such apology is justified or forthcoming, we insist that you not return to the church property and worship elsewhere.

Sincerely,

Ronald P. Kimery
Ronald P. Kimery, acting clerk of Session



Nancy Fleming
Banned Belmont
Grandmother

Daisy Davis
Banned Belmont
Student

33 Burton Hills Blvd.
Nashville, TN 37215
Phone: (615) 383-2206
Fax: (615) 383-3093

.....
A Congregation of the
Presbyterian Church
in America



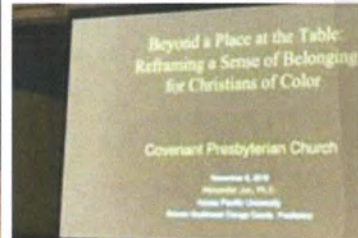
Belmont Dean Bryce Sullivan and Covenant Leaders are still banning a Belmont graduate from the Lord's Communion Table.



Covenant Presbyterian Church added 4 new photos.

Yesterday at 4:30 PM · 🌐

Thanks to all who came out last night for Alex Jun and his talk, "Beyond a Place at the Table: Reframing a Sense of Belonging for Christians of Color". Not only did Covenant members attend but pastors and leaders from several local churches. We look forward to continuing the conversations started last night.





Belmont Dean Bryce Sullivan banned a Belmont Student from public church services at Covenant, but he expected her to attend Belmont convocation.

From: **Bryce Sullivan**
Date: Tue, Apr 9, 2019 at 3:26 PM
Subject: Convocation hours for May graduation not complete!
To: daisy.davis
CC: James Al-Shamma

Daisy,

I am the Dean of your academic college, and I've been informed that you lack the needed convocation hours for graduation.

You have completed 49 convocation hours and have 11 hours remaining to be completed before you graduate. You must complete all required hours by April 23 or you will not be able to graduate in May or August. There are no convocation offerings in the summer.

Please work with your advisor to ensure your convocation hours are completed before your expected graduation date.

Bryce F. Sullivan, Ph.D.
Dean of the College of Liberal Arts and Social Sciences
Interim Chair, Department of Education

<http://www.belmont.edu/liberal-arts/>
<http://www.belmont.edu/education/>



**Dr. Bryce Sullivan
Belmont Dean**



**Nancy Fleming
Banned Belmont
Grandmother**



Daisy Davis – Banned



See sworn testimony by child sex abuse expert witness, Caroline Cone, on the next page:

Caroline Post Cone



Belmont Dean Bryce Sullivan is still participating in the false arrest and malicious prosecution of a Belmont father to protect child-molester John Perry and the abuse of a Belmont graduate.

Larry Crain - Protected Child-Molester John Perry's Attorney



Jay Sekulow - President Trump's Impeachment Attorney



Dr. Bryce Sullivan
Belmont Dean
Covenant Elder

IN THE CIRCUIT COURT OF DAVIDSON COUNTY TENNESSEE

COPY

Redacted)
)
 Plaintiff,)
)
 VS.)
)
 AUSTIN DAVIS,)
)
 Defendant.)

CASE NO. Redacted

Proceedings before the Court

March 14, 2016

EXCERPT: Testimony of Caroline Cone

Before: The Hon. Kelvin Jones, as Judge

Reported By: Priscilla Smith, LCR

A P P E A R A N C E S:

For the Plaintiff:

Mr. Larry Crain
Arena Law Firm, PC
5214 Maryland Way
Suite 402
Brentwood, TN 37027

The Defendant:

Mr. Austin Davis appeared Pro Se

ALSO PRESENT:

MS. REDACTED

MRS. DAVIS

I N D E X

WITNESS

CAROLINE POST CONE, MSN, APRN, BC	
Direct Examination by Mr. Crain.....	3
Cross Examination by Mr. Davis.....	13

E X H I B I T S

No. 1 Report.....	11
-------------------------	----

Reporter's Note: All proper names in the transcript are spelled phonetically, unless spelling is provided by counsel or witness.

1 CROSS EXAMINATION BY MR. DAVIS:

2 Q. Ms. Cone, did you say you had learned
3 about the child molestation in 2008?

4 A. Yes.

5 Good morning.

6 THE COURT: She said "good morning."

7 MR. DAVIS: "Good morning"?

8 THE COURT: "Good morning," to you.

9 Q. Oh, good morning. I asked a question.
10 Did you hear it?

11 A. Yes, sir. I answered it.

12 Q. So you learned about it in 2008?

13 A. Yes, sir.

14 Q. And what did you do?

15 A. What did I do with the information?

16 Q. Yeah.

17 A. Meaning, like, what -- did I contact?

18 Q. I just want to know what you did. Was it
19 a private thing at that point in time? Were
20 you -- I don't know; I'm not a counselor or
21 anything. I'm not a lawyer, so I'm just asking
22 questions.

23 Did you do anything, or did you just...

24 A. Sure. Yes, sir. My client, at the time,
25 was 18 years old, which is important to note. And

1 when RED came, the church called, and it was a
2 crisis, and could I get RED in fairly quickly, and
3 I said, absolutely. RED came in quickly.

4 And then, because I was not sure of what
5 to do, I contacted the Department of Children's
6 Services and spoke with a representative there, and
7 what they said was that because RED was now 18,
8 that it had left their office's abilities, and
9 so ---

10 Q. So when in 2008 did you first start
11 counseling RED ?

12 A. April.

13 Q. Or was it 2007, whenever it was?

14 A. It was 2008, and it was April.

15 Q. April. And so when the church calls you,
16 do you know who it was in the church that called
17 you?

18 A. One of the pastors.

19 Q. Do you remember who?

20 A. I believe it was Pastor Ferris.

21 Q. Pastor Larry Ferris? Pastor Larry Ferris
22 called you in April of 2008?

23 A. Yes, sir.

24 Q. Were, like, REDACTED back from TCS at
25 that time? Was it an active separation, or do you

1 know? Do you remember?

2 A. They hadn't separated yet.

3 Q. They hadn't separated. Okay. Well, they
4 separated on April 26th, is what the divorce
5 records say, so was it, like, in mid-April, maybe,
6 when they called?

7 A. Uh-huh.

8 Q. All right. Are you supposed to report it
9 to the DCS or police or anything?

10 A. If the child is under the age of 18.

11 Q. So there is no duty to report a child
12 molester if the statute of limitations is active or
13 running to 21?

14 A. So I did call and report the incident, and
15 they told me that it was not something that their
16 office handles once a child turns 18.

17 Q. You called DCS?

18 A. Yes. Yes, sir. I said that to you
19 earlier.

20 Q. Well, I called DCS, and they said it
21 hadn't been reported.

22 A. Well, I called them. I have
23 documentation.

24 Q. They have no record of it.

25 And then if it gets reported to DCS, then

1 DCS, I think, has to let the police know, and then
2 the police come and investigate.

3 A. My understanding, when I reported it, is
4 that they told me that they don't start working on
5 cases where children are the age of 18 or above.
6 That's my understanding.

7 Q. I'm not -- I mean, I'm just asking because
8 I don't know. This was all murky to me when I got
9 to it and did it. I'm just trying to figure out
10 what happened. Because I called them in 2012.

11 I went to the FBI, the US -- I didn't go
12 to the police, because I was too scared to go the
13 police, of course ---

14 THE COURT: Mr. Davis, if you could just
15 focus on the question. I know this is helpful
16 information for you, but just ask her
17 questions, if you would.

18 THE WITNESS: Would it be okay if I get
19 some water?

20 THE COURT: Yes, yes.

21 Q. (BY MR. DAVIS) So the police, the first
22 time you ever talked to any police was in 2013?

23 A. Correct.

24 Q. Are you sure about that? It's hard -- I
25 say "are you sure" because I reported this in

1 October of 2012. And the police brought me in on
2 December 5th. My wife -- there were eight police
3 officers there. High-level, all the way to the
4 top.

5 THE COURT: Mr. Davis, now, you're
6 testifying about your own experiences.

7 MR. DAVIS: Okay.

8 THE COURT: So just ask Ms. Cone about
9 her experiences.

10 MR. DAVIS: I may become a lawyer, if I
11 stay here long enough and you coach me. Okay.

12 Q. (BY MR. DAVIS) So the police told me, on
13 December 5, 2012, that the investigation was closed
14 and over and that they had already talked to
15 everybody. So could you think back a little bit
16 and see if it was sometime at the end of 2012,
17 maybe?

18 A. According to my records, I got a call in
19 July of 2013 by a detective who was researching the
20 case. That's what's documented in my records.

21 Q. Do you know who that was?

22 A. I don't. I have it written down, but I
23 don't know what detective it was. I met him in
24 person, I talked to him on the phone. he came to my
25 office, and the three of us had a conversation.

1 And I will say, sir, that that was
2 extremely traumatizing for my client.

3 Q. Okay, and so your testimony -- are you
4 saying -- I just want to be clear -- you're saying
5 I'm the one traumatizing your client?

6 A. Yes.

7 Q. Has the child molester, has he traumatized
8 your client?

9 MR. CRAIN: Objection, your Honor.
10 Irrelevant.

11 THE COURT: I will sustain the objection.

12 Obviously I think it's inherent in the
13 witness' testimony that the underlying event
14 was traumatizing, so -- and I think what she's
15 saying is that by you publishing information
16 regarding the incident, that when **REDACTED**
17 hears about it, it continues to traumatize
18 **RED**.

19 I think that's what she testified to.

20 THE WITNESS: Exactly.

21 THE COURT: I don't think she said that
22 you've intended to do anything, but she's
23 saying when **REDACTED** hears about it, it has a
24 traumatic effect.

25 THE WITNESS: I'm guessing that you care.

1 I'm guessing that you care and want the truth
2 to come out.

3 However, what ends up happening is, it
4 ends up backfiring, and RED just really is
5 highly anxious, and the word is
6 "revictimized," every time something comes out
7 on BuzzFeed or something like that,

8 Q. (BY MR. DAVIS) So if, when I came forward
9 and brought it to people's attention in 2012 and
10 everybody who was involved had just said, yes, this
11 is what we did, then there wouldn't have been
12 anything traumatizing, is what I believe, possibly,
13 if people told the truth.

14 A. I don't believe I can speak to that.

15 THE COURT: That's your experience. She
16 can't -- she doesn't know anything about your
17 experience. So you're asking her to speculate
18 about something you did. She doesn't know
19 anything about that.

20 She only knows -- she's going to testify
21 to her experience. So when you say something
22 like that, and "I went to the folks in 2012,"
23 she doesn't know that.

24 MR. DAVIS: Okay.

25 THE COURT: So ask her questions.

1 Q. (BY MR. DAVIS) Who is the molester?

2 A. Who is the what?

3 Q. The molester. Do you know who the
4 molester was?

5 A. Yes, sir.

6 Q. Did you name him?

7 A. Yes, sir.

8 Q. Who is it?

9 A. John Perry.

10 Q. Do you know how many times?

11 A. How many times ---

12 THE COURT: I don't know how that's
13 relevant. How is that relevant? You asked
14 her a question.

15 MR. DAVIS: I thought she was a
16 psychologist.

17 THE COURT: How is that relevant?

18 THE WITNESS: May I say one thing?

19 MR. DAVIS: I asked her a question.
20 She's testifying as a psychiatrist or
21 whatever.

22 THE WITNESS: Hang on one minute. So my
23 understanding is that we're here to determine
24 whether the continued publicity around this
25 issue affects my client, which it really does,

1 but I will also say that the more details you
2 ask me related to RED sexual abuse will
3 retraumatize RED far more than some other
4 things have in the past year or so. And that
5 would be my concern as a clinician.

6 Q. (BY MR. DAVIS) It's relevant because
7 we're sitting here in 2016. Back in 2008, people
8 were discussing something, and I have a question I
9 want to ask you.

10 Do you practice relational restoration?

11 A. As an entity?

12 Q. As a counseling technique.

13 A. Yes, I don't know what that specific term
14 means, but if that needs to happen, then
15 absolutely.

16 Q. So when there -- a child's molested, is
17 relational restoration -- and the Presbyterian
18 Church of America has admitted that they did do for
19 a long time -- is that a technique where you sit
20 down with the victim and the person who did the
21 molesting and go over that in tremendous detail to
22 try to find out what he did?

23 A. Well, so it is not appropriate for every
24 relationship to be restored; it's just not. In
25 general population, mostly it is not appropriate.

1 Q. Was it used in this case?

2 A. I don't know in this case what the church
3 did with it. I only know from my perspective what
4 happened in counseling sessions.

5 Are you asking me about the church?

6 Q. Did you ever sit down with the parties
7 involved and go through that practice with them?

8 A. I sat down with the parties involved, and
9 the purpose was not relational restoration. The
10 purpose was disclosure and healing for my client
11 and also some -- it -- it is helpful when somebody
12 admits to harming you, in front of you.

13 Q. Does that ever backfire with anybody?
14 Does it ever hurt them? Is it ever traumatic for
15 them?

16 A. So are you asking if the process of
17 relational ---

18 Q. Is that done, like it would be, like, on a
19 high school coach and a 13-year-old girl, where the
20 school wanted to get them together, set them down
21 together and make sure that didn't happen, to try
22 to have the child reclaim something with the person
23 and still restore the gift that the person's
24 done -- no police involved or anything, but try to
25 work that out, is that something that -- does that

1 work all the time?

2 A. Well, are you asking based on my own
3 experience or ---

4 Q. I'm just asking -- because I'm not a
5 psychiatrist, or anything. I'm just asking, is
6 that a practice, and I'm wondering if it's
7 successful.

8 A. I really don't know. I really don't know
9 if that whole concept of relational restoration is
10 healing or helpful.

11 Q. Did you ever go to a counseling meeting at
12 the church or have a meeting at the church?

13 A. About this case?

14 Q. Yes.

15 A. No.

16 Q. Did you go up there as a member?

17 A. No, sir.

18 Q. Are you a member of the PCA?

19 A. Yes, sir.

20 Q. Which church?

21 MR. CRAIN: Object. How could that
22 possibly be relevant, what church she attends?

23 THE COURT: It's not relevant. Let's
24 move on.

25 Q. (BY MR. DAVIS) So when you called DCS,

1 they told you there was nothing that could be done?

2 MR. CRAIN: Objection, hearsay.

3 MR. DAVIS: Huh?

4 THE COURT: She's already testified. Her
5 testimony was, she contacted DCS, and DCS
6 informed her that because REDACTED was 18, that
7 they don't handle those matters.

8 Q. (BY MR. DAVIS) Did you know other
9 children had been put in the molester's house back
10 in 2002?

11 A. Other children had been put ---

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

15 A. I did not know that.

16 Q. Yes. That was done in 2002 ---

17 MR. CRAIN: Objection. That's testimony,
18 your Honor.

19 THE COURT: You're testifying. You're
20 trying to ---

21 MR. DAVIS: I'm not trying ---

22 THE COURT: You asked her a question:
23 Was she aware of a safe house back in 2002.
24 Her answer was no, she was not aware.

25 Then you said: Well, you know, it was

1 this, this was going on.

2 That's not -- ask a question.

3 Q. (BY MR. DAVIS) As a person that deals
4 with people who have been molested, is that a
5 concern to you?

6 A. That it was a safe house?

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

10 A. That would be a concern for me.

11 MR. DAVIS: Thank you.

12 THE COURT: All right. Anything else?

13 MR. CRAIN: No further questions.

14 THE COURT: Thank you. You're free to
15 go. All right.

16 (The witness was excused.)

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REPORTER'S CERTIFICATE

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I, Priscilla Smith, Notary Public and
Licensed Court Reporter in the State of Tennessee,
do hereby certify that I was present at and did
report, to the best of my skill and ability, by
machine shorthand, all the proceedings in the
foregoing excerpt, and that said excerpt is a true
and accurate transcript of the proceedings to the
best of my ability.

I further certify that I am not an attorney
or counsel of any of the parties, nor a relative or
employee of any attorney or counsel connected with
the action, nor financially interested in the
action.

SIGNED this 18th day of ~~October~~ ^{November} 2018, 2016.

Priscilla Smith

Priscilla Smith, LCR
LCR No. 600

Expires: ~~6/30/2018~~ 6/30/2020

Notary Public, Expiry December ~~9~~ ⁵, 2016
2020

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SEP 19 2018

RICHARD R. RDOKER, 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

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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.

14

EXAMINATION

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. CRAN: 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 WITNESE: 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 WITNESE: 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 had 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 Mark.
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.)
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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