

CHILD MOLESTER GLOBAL STATEMENT TO THE LONDON DAILY MAIL

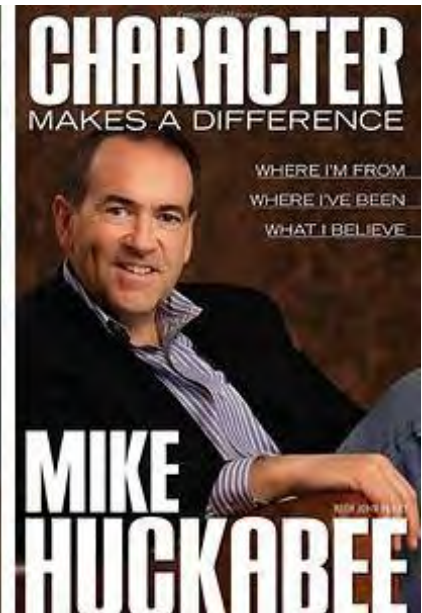
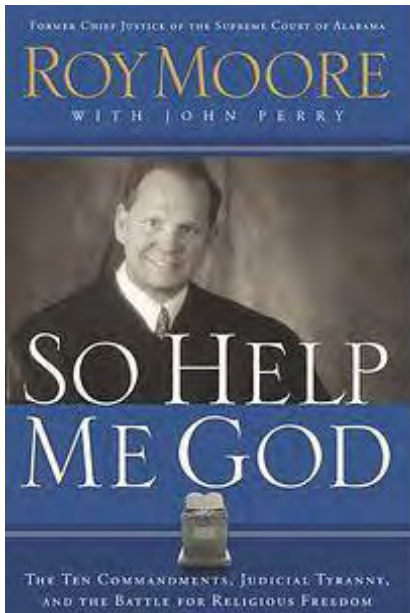
JOHN PERRY'S STATEMENT TO DAILY MAIL ONLINE

Thank you for getting in touch. I haven't read the article but have heard about it.

I don't have anything to say for the record, but will tell you that the person behind it has been pursuing a vendetta against his former church for years and this story is one of the means he has used.

Having failed there, he has evidently turned his attention elsewhere.

I will also tell you that whatever **private difficulties** there may have been, the parties involved were reconciled and restored years ago, for which I thank God every day. June 11, 2015



Caroline Cone – Child Sex Abuse Therapist Witness

Caroline Cone sworn testimony begins on next page.

IN THE CIRCUIT COURT OF DAVIDSON COUNTY TENNESSEE

COPY

Redacted)
)
 Plaintiff,)
)
 vs.) CASE NO. Redacted
)
 AUSTIN DAVIS,)
)
 Defendant.)

Proceedings before the Court

March 14, 2016

EXCERPT: Testimony of Caroline Cone

Before: The Hon. Kelvin Jones, as Judge

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.

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	
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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.)

17 * * * * *

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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

FILED

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

SEP 19 2018

RICHARD R. RDOKER, Clerk
By *M. Esmy* 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.

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.

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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 RED is 18; what do I
12 do?" And they said that they do not handle cases
13 after a child turns 18.
14 Q. So what happens to the child molester?
15 MR. CRAIN: Objection; calls for legal
16 conclusion.
17 You may answer, if you know.
18 THE WITNESS: It would be up to the
19 person who was sexually assaulted to bring charges.
20 BY MR. DAVIS:
21 Q. I mean, I'm not in this world, in this realm
22 at all. I'm not trained; I'm not a professional.
23 You're obviously a professional now trained in the
24 medical world. I'm just an average person.
25 Is child -- and there are privileges that are

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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.

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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

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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

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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

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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

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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

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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

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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

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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?

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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.

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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?

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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.
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