

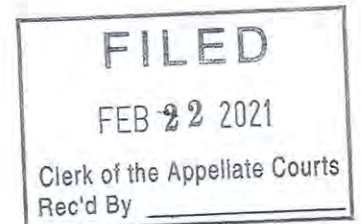
**IN THE CRIMINAL APPEALS COURT FOR THE STATE OF TENNESSEE  
MIDDLE DIVISION SECTION AT NASHVILLE**

**Willie Austin Davis**

Defendant/Appellant

vs.

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



**State of Tennessee**

Plaintiff/Appellee

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

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1. Pursuant to Tennessee Rule of Appellate Procedure 14(a), Appellant moves the Court to consider the facts hereinafter set forth. For grounds, Appellant states these facts occurred after the judgment herein appealed.
2. On or about Feb 12, 2021, Appellant learned that Lincoln Project Co-Founder, John Weaver, was the top Presidential Campaign strategist for Ohio Governor John Kasich during the 2016 campaign. Exhibit 1
3. On or about Jan 31, 2021, the New York Times reported that 21 men, including a 14-year old minor, had made allegations of being sexually harassed by former John Kasich Presidential campaign strategist, John Weaver. Exhibit 2
4. On or about Feb 16, 2021, the London Daily Mail reported that a 2<sup>nd</sup> minor had also stepped forward to make an allegation of being sexually harassed by former John Kasich Presidential campaign strategist, John Weaver. Exhibit 3

5. On or about Feb 27, 2016, John Weaver was a top Presidential campaign strategist to Gov. John Kasich when the Appellant provided child sex abuse cover-up information to Gov. Kasich during a televised C-Span Nashville town hall rally. Exhibit 4
6. On or about Feb 27, 2016, Appellant informed Gov. John Kasich about a child sex abuse cover-up connected to the GOP Presidential campaign of Gov. Mike Huckabee in 2008.
7. On or about June 10, 2015, eight months prior to the Nashville - John Kasich C-Span town hall rally, BuzzFeed News published an article about child-molester John Perry, Roy Moore, Gov. Mike Huckabee, and other leaders in the Southern Baptist Convention.
8. On or about Feb 10, 2019, the Houston Chronicle published an "*Abuse of Faith*" investigative report about more than 700 victims of child sex abuse, mostly children, who had reported being sexually abused by roughly 380 Southern Baptist church leaders or volunteers since 1998. A Houston Chronicle news source and trusted friend of the Appellant, Oklahoma Pastor Wade Burleson, proposed a Southern Baptist data base for sex predators in 2007, and also wrote a widely read blog article on child-molester John Perry and a statute of limitations problem with BuzzFeed News, Nashville Police and others here in Nashville. The Wade Burleson link below was provided to ex-Asst DA Chandler Harris during pre-trial discovery on page 51 of Technical Record Volume 1, but ex-Asst DA Chandler Harris ignored the exculpatory evidence of John Perry's child sex abuse to intentionally tell the Appellant's trusting jury that the John Perry's child sex abuse was "*myths*" and a "*red herring.*" Exhibit 5. Appellate Record Exhibit 5 – Motion For New Trial Hearing – 2 of 4 - – Trial Transcript Vol 1 – Pg 78. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Trial Transcript Vol 2 – Pg 121. TR Vol 3 – Pg 399. TR Vol 1 – Pg 51.  
<https://www.wadeburleson.org/2015/06/child-abuse-statute-of-limitations-and.html>

9. Protected child-molester John Perry ghostwrote and submitted the original biography manuscript to Rev. Franklin Graham for Rev. Billy Graham's biography entitled, "*Through My Father's Eyes*." Rev. Billy Graham was an ordained Southern Baptist minister who belonged to First Baptist Church of Dallas for 50 years prior to changing his membership to First Baptist Church of Spartanburg, South Carolina. Rev. Billy Graham's long-time friend and publisher was Thomas Nelson President and CEO, Sam Moore, a ruling elder at Covenant Presbyterian Church where the Appellant's family is still unlawfully banned. Liberty University President Jerry Falwell Jr, and his wife, Becki, attended the funeral visitation at Covenant Presbyterian Church for Sam Moore, prior to the "*pool boy*" sex scandal which resulted in the resignation of Jerry Falwell, Jr. as President of Liberty University. Exhibit 5
10. The BuzzFeed News article was written in June 2015 and information about child-molester John Perry ghost-writing Rev. Billy Graham's final biography during Rev. Graham's time alive was not yet discovered by the Appellant until on or about, May 2, 2018. This was during the same period of time when Attorney Larry Crain filed a \$3 million dollar lawsuit on behalf of child-molester John Perry, and while Attorney Larry Crain had already filed a \$3 million "*defamation – invasion of privacy*" lawsuit against the Appellant, and Attorney Larry Crain had already filed a \$1.5 million dollar "*defamation*" lawsuit against the mother of the 6<sup>th</sup> grade Brentwood Academy alleged gang rape victim, who lived, or still lives, about 12 doors away from protected child-molester John Perry.
11. The BuzzFeed news article included false information about the statute of limitations for child sex abuse by John Perry being expired, and the BuzzFeed news article did not include information about the Nashville Police Department silencing the Appellant and his family to

protect child-molester John Perry's "*safe house*," which was used by Covenant Presbyterian Church Leadership for other vulnerable children in the church. Exhibit 6

12. It is now known through the sworn testimony of child sex abuse therapist, Caroline Cone, that Nashville Police Detective Chuck Fleming knew about the child sex abuse across state lines, on or about Oct 22, 2012. There is no statute of limitations for child sex abuse across state lines under the Federal Mann Act which child-molester John Perry violated at least one time, and possibly more than one time in more than one state beyond Tennessee. Exhibit 7 – Pgs 10-12, 24-25, 34-35.
13. Nashville Police Spokesman Don Aaron provided false "*statute of limitations*" information to a global audience further protecting child-molester John Perry and a Mann Act Federal crime cover-up which is still on-going before the Tennessee Court of Criminal Appeals. Exhibit 6
14. On or about June 11, 2015, eight months prior to the Nashville - John Kasich C-Span town hall rally, the London Daily Mail published an article with false "*statute of limitations*" information and a very deceptive global statement made by child-molester John Perry. The London Daily Mail has not allowed the Appellant to publicly respond to the false information within the London Daily Mail article, or to publicly respond to the deceptive global public statement made by child-molester John Perry to further damage and demonize the Appellant. Exhibit 8
15. To date, BuzzFeed, the London Daily Mail, Gannett, and many other news organizations have not corrected false information published by their news organizations as requested by the Appellant, nor have any news organizations informed the public with truthful information about the false retaliation arrest and the unlawful jailing of the Appellant, nor

have any news organizations allowed the Appellant to respond publicly to child-molester John Perry. Appellant's emails with former BuzzFeed reporter Andrew Kaczynski and former BuzzFeed chief editor, Ben Smith, clearly reveal how BuzzFeed News has crossed the sacred line of professional journalism and ethics to actively participate in a John Perry – Mann Act Federal crime cover-up which endangers children in Nashville, and beyond.

Exhibit 9

16. BuzzFeed News has betrayed a news source and crossed a sacred journalistic line to actively participate in a Mann Act Federal crime cover-up which is still on-going before the Tennessee Court of Criminal Appeals. A similar news organization named Gawker is no longer in business after doing something far less serious than breaking a Federal Law to actively protect child-molester John Perry, and yet BuzzFeed News remains dedicated to protecting the false "*statute of limitations*" information, to the great detriment and harm of the Appellant and his family.
17. On or about Feb 27, 2016, Appellant informed Gov. John Kasich about the child sex abuse cover-up and Gov. John Kasich reassured the Appellant and the C-Span audience that he would be willing to help by contacting the Nashville Mayor, or the Tennessee Governor, after Gov. Kasich also heard things that were not good the night before when he was campaigning in Memphis.
18. On or about Feb 27, 2016, Appellant and his daughter met with Gov. John Kasich's personal aide, Alex Thomas, following the C-Span town rally and Alex Thomas provided the Appellant his campaign contact information. Exhibit 10

19. On or about Feb 27, 2016, Appellant and his daughter, a student at Belmont University, also spoke with Belmont University Law Dean Alberto Gonzales. A photograph of Mr. Gonzales with Worrick Robinson's cousin is also included in the exhibit. Exhibit 10
20. On or about Feb 27, 2016, through the present, Feb 22, 2021, Belmont University Law Dean Alberto Gonzales and John Kasich's Presidential campaign, which included top advisor John Weaver, have not followed up with the Appellant, or with the Appellant's banned, bullied and molested daughter, Daisy Davis. Sworn Declaration.
21. Appellant does not own the C-Span video. To view the Appellant's C-Span exchange with Gov. John Kasich, one must go to the 37:45 time mark at the C-Span link below:  
<https://www.c-span.org/video/?405392-1/john-kasich-town-hall-meeting-nashville-tennessee>
22. On or about July 12, 2017, Appellant provided the BuzzFeed News information and the C-Span link to ex-Asst. DA Chandler Harris as part of pre-trial discovery.
23. Even though Nashville Police provided a statement to BuzzFeed News that the child sex abuse allegations had been investigated and sustained, ex-Asst. DA Chandler Harris disregarded the police statement, other sworn statements, and audio recordings provided to him during pre-trial discovery. Ex-Asst. DA Chandler Harris lied to a trusting jury that John Perry's child sex abuse was "*myths*" and a "*red herring*," even though he as a public servant prosecutor knew John Perry was a child-molester. Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Trial Transcript Vol 1 – Pg 78. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Trial Transcript Vol 2 – Pg 121. TR Vol 3 – Pg 399.
24. On or about July 12, 2017, Appellant provided a "*keep and share*" file to ex-Asst. DA Chandler Harris which included the BuzzFeed News information (with false police statements about the statute of limitations), and the link to the C-Span video exchange with Gov. John Kasich, which took place, on or about, Feb 27, 2016. TR Vol 1 – Pg 51.

25. The BuzzFeed News information and the John Kasich C-Span link were provided within a “*keep and share*” link identified as item #1 under Discovery and Other Links. TR Vol 1 – Pg 51.

<https://www.keepandshare.com/doc4/show.php?i=2545072&cat=0&all=y>

26. The BuzzFeed News information and false police statements about the statute of limitations being expired were provided to ex-Asst DA Chandler Harris at these links prior to the malicious prosecution and trial of the innocent Appellant:

<https://www.keepandshare.com/doc4/69682/2015-cc8a-june-11-buzzfeed-protected-those-who-concealed-a-child-molester?da=y>

<https://www.keepandshare.com/doc4/57881/2015-dd4-sept-10-last-appeal-to-judge-kelvin-jones?da=y>

27. Appellant’s exchange with GOP Presidential Candidate John Kasich was provided to ex-Asst. DA Chandler Harris prior to the Appellant’s trial on page 7 via the “*keep and share*” link below:

<https://www.keepandshare.com/doc4/73326/2016-c9-mar-10-recusal-motion-for-injunction-3-million-lawsuit?da=y>

28. The C-Span link is available to the public, but the exculpatory “*keep and share*” file and the Appellant’s evidentiary links are no longer available to the public in submission to an injunction granted to child-molester John Perry’s powerful attorney, Larry Crain, long-time friend and former senior ACLJ counsel with President Trump’s 1<sup>st</sup> impeachment attorney, Jay Sekulow. Elite protected child-molester, John Perry, also had a book proposal with Jay Sekulow’s ACLJ organization, and was promised personal interview access with Jay Sekulow. Elite protected child-molester, John Perry, also ghostwrote a book for Mike

Huckabee and Jay Sekulow's long-time friend, Rev. Franklin Graham, along with many other prominent leaders within the Southern Baptist Convention.

29. Ex-Asst. DA Chandler Harris abused and misused the power of his prosecutorial office to wrongfully prosecute the Appellant to protect child-molester John Perry and a Mann Act Federal crime cover-up. Asst. DA Chandler Harris' demonization and wrongful conviction of the Appellant also serves to protect the alleged gang rapes of a 6<sup>th</sup> grade Brentwood Academy student, and also serves to protect Lincoln Co-Founder John Weaver, who is now accused of sexually harassing 22 men (including two minors), and is also possibly involved in an on-going Mann Act Federal crime cover-up as a top strategist and advisor to the 2016 Presidential Campaign of Gov. John Kasich, which did not follow-up with the Appellant for reasons which have never been explained.
30. Appellant is not a trained attorney but it is Appellant's citizen understanding that Public Servant Prosecutors have a professional duty to be fair and honest with their prosecutions of ordinary citizens. In the case now before the Honorable Court, ex-Asst. DA Chandler Harris knew that John Perry's child sex abuse was a rock-solid fact, but he persisted with a malicious prosecution to obtain the Appellant's wrongful conviction without any regard for his professional duty or ethical standards as a public servant prosecutor. In hindsight, Appellant now believes it is possible that ex-Asst. DA Chandler Harris knew about secret grand juror Scottie Coombs being placed on the Appellant's 1<sup>st</sup> contaminated grand jury, and it is possible that ex-Asst DA Chandler Harris knew about secret grand juror DCSO Sgt. Solomon Holley being placed on the Appellant's 2<sup>nd</sup> contaminated grand jury, as the Appellant's 5<sup>th</sup> Amendment "*due process*" rights were denied in order to secure two toxic indictments, and a subsequent wrongful conviction, and 18 days in jail.



31. Ex-Asst DA Chandler Harris mocked John Perry's child sex abuse crimes as "*myths, a red herring, and ideations,*" and he proceeded with a "*malicious prosecution*" to obtain a wrongful conviction which criminalized, demonized, damaged and defamed the innocent Appellant, further protecting the John Perry – Mann Act Federal crime cover-up, and possibly other elite sex predators who are still unexposed and protected by the political sexual predator spider web here in Nashville, and beyond. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 - Trial Transcript Vol 2 – Pg 121 and 123. TR Vol 3 – Pg 399. Appellant Brief – Pgs 40-41
32. Subsequent to a new trial hearing before Judge Cheryl Blackburn, on or about, July 12, 2019, and sometime near the date when the Appellant filed his notice of appeal, on or about, Oct 16, 2019, ex-Asst. DA Chandler Harris escaped professional accountability and fled from the State of Tennessee to work for Mullen Coughlin Law Firm near Philadelphia, PA. <https://www.mullen.law/people/s-chandler-harris/>
33. The intentional "*malicious prosecution*" of the innocent Appellant by Ex-Asst. DA Chandler Harris continues to harm the Appellant and the Appellant's family, including a new message received by the Appellant from the powerful Bass, Berry and Sims attorney, and former chair of the Tennessee Chamber of Commerce and Industry, Bill Ozier, which stated: "Stop sending me this trash." Exhibit 11
34. Appellant does not believe that his own daughter is trash, or that other victims of sex predator crimes are trash, and Appellant prays that Tennessee Attorney General Herbert Slatery, General David Findley, and the Tennessee Court of Criminal Appeals do not consider child sex abuse victims, or any other victims to be throw-away trash.

35. Appellant prays for the Tennessee Court of Criminal Appeals will not actively participate in an on-going Mann Act Federal crime cover-up, but will consider any and all information related to child-molester John Perry and any other concealed and protected sexual predators, in pursuit of substantial justice and to protect vulnerable children.

Respectfully Submitted,



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**CERTIFICATE OF SERVICE**

I, Willie Austin Davis, hereby certify that a true and exact copy of the foregoing motion has been forwarded by United States Postal Service, first class, postage pre-paid, on Feb 22, 2021, to the following parties:

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



Willie Austin Davis, Citizen  
221 31<sup>st</sup> Ave. North Apt# 135  
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Memorandum of Points and Authorities  
Introduction

Appellant brings this motion pursuant to Tenn. R. App. P. 14 to provide the Honorable Court with new information about the Appellant's televised C-Span exchange with GOP Presidential Candidate John Kasich. A link of the John Kasich C-Span exchange was provided to ex-Asst. DA Chandler Harris during pretrial discovery, and is already a part of the Appellate record. However, new information has now been discovered about 22 sexual harassment allegations against John Kasich's Presidential strategist, John Weaver, which was not known or discovered by the Appellant until, on or about, Feb 12, 2021.

This new information is significant because a Mann Act Federal crime cover-up is presently occurring "*real-time*" before the Honorable Court, and a Mann Act Federal crime cover-up has also been taking place for the past five years since the John Kasich – C-Span town hall rally took place on Feb 27, 2016. During the past five years as the Mann Act Federal crime cover-up continued and intensified, Gov. John Kasich, John Weaver, Belmont Law School Dean Alberto Gonzales, and the John Kasich Presidential campaign have never followed up with the Appellant and his banned, bullied, and molested daughter, nor have any of them ever offered an explanation for why the Kasich campaign never followed up, or what the Kasich campaign was told if they ever contacted the Nashville Police, Attorney Worrick Robinson, the Mayor of Nashville, the Governor of Tennessee, or anyone else the Kasich campaign possibly contacted.

Appellant remains hopeful that Tennessee Attorney Herbert Slatery, General David Findley, the Tennessee Court of Criminal Appeals, Gov. John Kasich, Belmont Dean Alberto Gonzales, and staff members of the 2016 John Kasich Presidential campaign, still believe in protecting children and others from sex predators, and Appellant also remains hopeful that fair

“*due process*” established by the power and authority of the 5<sup>th</sup> Amendment of the U. S. Constitution, will be afforded to the innocent Appellant by a Tennessee State Court, or a U.S. Federal Court, in submission to the U.S. Constitution and the rule of law.

Appellant was wrongfully prosecuted, convicted and jailed for trying to protect children, and Appellant is innocent of aggravated criminal trespass at a public Sunday church service at Covenant Presbyterian Church in Nashville, on Nov 15, 2015, five months after BuzzFeed, the London Daily Mail, and many other news organizations published false information about John Perry escaping the statute of limitations for criminal activity against at least one pre-teen child, and possibly others, including the Appellant’s own daughter, who provided sworn testimony during the Appellant’s criminal trial.

#### Background

On or about July 12, 2017, Appellant provided the John Kasich 2016 televised C-Span town hall rally with discovery information to ex-Asst. DA Chandler Harris. Unfortunately, ex-Asst. DA Chandler Harris was unwise and reckless to disregard all exculpatory information provided to him, or all exculpatory information secretly known to Nashville Police and the Nashville DA’s Office but never provided to the Appellant, and ex-Asst. DA Chandler Harris pursued a “*malicious prosecution*” to obtain a wrongful conviction of the innocent Appellant.

On or about Feb 12-16, 2021, Appellant learned that John Kasich’s top Presidential strategist, John Weaver, was accused by 22 men, including two minors, of on-line sexual harassment and sending sexually provocative messages.

Appellant and Appellant’s abused family, along with a growing number of fathers, mothers, and students who do not support child sex abuse or rape, are quietly reading The Silent Bell web

site to monitor the Appellant's "*malicious prosecution*," and the integrity of the Tennessee Judicial System.

Appellant remains hopeful that Tennessee Attorney General Herbert Slatery, General David Findley, and/or the Tennessee Court of Criminal Appeals, will support the Appellant and innocent citizens who try to protect children from sex predators, rather than perverting the law to punish those law-abiding citizens who follow the mandatory reporting laws to identify sex predators to law enforcement for the protection of vulnerable children in the community.

Appellant remains hopeful the Tennessee Attorney General Herbert Slatery, General David Findley and/or the Tennessee Court of Criminal Appeals, will take immediate action or exercise prosecutorial or "*sua sponte*" authority to reverse the "*malicious prosecution*" and final judgment to declare the Appellant to be innocent, and to protect and safeguard the public's confidence in the integrity of Tennessee Prosecutors and the Tennessee Judicial System.

#### Standard

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

or the appellate court acts on its own motion, the court, by appropriate order, shall direct that the facts be presented in such a manner and pursuant to such reasonable notice and opportunity to be heard as it deems fair.” Tenn. R. App. P. 14(c)

**I. The John Kasich Presidential Campaign’s Active or Passive Participation In A Mann Act Federal Crime Cover-Up Merits Review For Substantial Justice**

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

Appellant’s discovery of new information about the sexual harassment allegations of 22 men, including two minors, further exposes the John Kasich 2016 Presidential Campaign and the never-ending protection afforded to prominent child-molester John Perry, and any other Presidential level sex predators the Nashville DA’s Office may still be intentionally hiding or protecting. Gov. John Kasich publicly offered to help the Appellant pre-trial by contacting the Mayor of Nashville (Megan Barry), or the Governor of Tennessee (Bill Haslam), and it is unknown if Gov. Kasich ever spoke to Mayor Megan Barry, or Gov. Bill Haslam (childhood

friend of Tennessee Attorney General Herbert Slatery), or to anyone at the Nashville Police Department or the Nashville DA's Office, or to anyone else in Tennessee or Washington D.C..

Appellant now provides this new information to the Honorable Court because it is known that John Perry is an elite protected Presidential campaign biographer and know child-molester, and it is also known that John Weaver was an elite Presidential campaign advisor accused of being a protected sex predator, and it is also now known that the Nashville Police Department and the Nashville DA's Office concealed exculpatory information about the Mann Act Federal crime cover-up provided to sex crimes Detective Chuck Fleming on Oct 22, 2012, therefore the Nashville Police Department or the Nashville DA's Office may be hiding and concealing any contact it may have had with the John Kasich Presidential Campaign during the on-going Mann Act Federal crime cover-up.

Additionally, if the Nashville DA's Office had pursued substantial justice to prosecute protected child-molester John Perry instead of the innocent Appellant, it is possible that other numerous "*Silent No Longer*" victims within the Nashville Police Department might have been protected instead of working in a hostile work-place environment prior to the early retirement of former Police Chief Steve Anderson.

#### Conclusion

Appellant prays the Honorable Court will grant this post-judgment motion to take decisive action to establish a new culture of honesty and integrity within the Nashville Police Department and the Nashville DA's Office, in order to prosecute child-molesters, sex predators and sex bullies, rather than to prosecute innocent citizens who report them to law enforcement. Appellant continues to believe in Almighty God and His administration of mercy and justice via



the appointed and elected Tennessee Judges who are accountable to Almighty God for all rulings and judicial decisions made, especially when it comes to the safety and welfare of God's precious little children, who are special and loved by Almighty God as revealed in Matthew 18.

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

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

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

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

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

In closing, The Honorable Andy D. Bennett wrote the following minority opinion in a related John Perry child sex abuse cover-up lawsuit (Case # M2018-██████-COA-R3-CV) involving the Appellant on Sept 6, 2019: “*I believe Mr. Davis did not receive an impartial trial.*” Appellant prays the Tennessee Attorney General and the Tennessee Court of Criminal Appeals will also conclude that the Appellant did not receive an impartial trial in this related case, and more importantly, that the innocent Appellant was falsely arrested and wrongfully convicted.

May God bless the Honorable Court.

Respectfully Submitted,



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In an abundance of caution, the identity of John Perry’s child sex abuse victim #1 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. **REDACTED** = ██████

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

**Willie Austin Davis**

Defendant/Appellant

vs.

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

**State of Tennessee**

Plaintiff/Appellee

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**DECLARATION OF APPELLANT WILLIE AUSTIN DAVIS**

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1. I, Willie Austin Davis, am an adult citizen, and resident of Nashville, Tennessee and do make this declaration based on my own personal knowledge.
2. I am presently 65 years of age.
3. On or about Feb 12-16, 2021, I personally learned about the sexual harassment allegations by 22 men (including minors) against John Kasich's former Presidential advisor and Lincoln Project Co-Founder, John Weaver. I personally printed out several news articles about John Weaver which are included as Exhibits 1-4.
4. On or about Sept 24, 2018, child-molester John Perry's powerful attorney, Larry Crain, was awarded a \$2.1 million default judgment against me, and he was also granted a limited injunction to protect the name of John Perry's child sex abuse Victim #1. Attorney Larry Crain was also suing Rev. Billy Graham's publisher for \$3 million at the same time, and he was also suing the mother of the 6<sup>th</sup> grade Brentwood Academy alleged gang rape victim for \$1.5 million. I personally printed the articles about Rev. Billy Graham, Jerry Falwell, Jr., Covenant Ruling Elder Sam Moore, the Houston Chronicle "Abuse of Faith" article about 700 child sex abuse cases, which are included as Exhibit 5.
4. On or about June 10-11, 2015, BuzzFeed News, the London Daily Mail, and other news organizations published false information which are still damaging and harming my family. Nashville Police provided false information to BuzzFeed News about the statute of limitations being expired for John Perry's child sex abuse crimes, even though the Tennessee statute of limitations were extended by the child sex abuse cover-up, and even though there is no statute of

limitations for John Perry's child sex abuse across state lines under the Federal Mann Act. I personally printed out the partially false BuzzFeed news article about child-molester John Perry which is included as Exhibit 6. I also personally printed out the partially false London Daily Mail news article about child-molester John Perry which is included as Exhibit 8.

5. The Caroline Cone deposition was taken at the office of Attorney Larry Crain on Sept 11, 2018, a year after my trial before Judge Steve Dozier which began on Sept 11, 2017. The Caroline Cone deposition is included as Exhibit 7.

6. BuzzFeed and London Daily Mail both published a deceptive global public statement by child-molester John Perry, which further harmed the Appellant and his family, but neither news organization allowed me or anyone in my family to make a truthful global public statement in response.

7. I personally requested for corrections to be made to the partially false articles published by BuzzFeed News, London Daily Mail, and other news organization stories, but no corrections have yet been made.

8. On or about June 7, 2019, four years after BuzzFeed News betrayed their news source to publish partially false information damaging and harming my family, I personally wrote BuzzFeed News Chief Editor, Ben Smith, informing him of a Mann Act Federal crime cover-up and asking him to correct the partially false information published on or about, June 10, 2015. Ben Smith has now benefited from the Mann Act Federal crime cover-up to become the media columnist for the New York Times. Former BuzzFeed reporter, Andrew Kaczynski, has now benefited from the Mann Act Federal crime cover-up to become a CNN senior editor and a founding member of CNN's Kfile.

9. In stark contrast, I am the BuzzFeed News source betrayed by BuzzFeed News, falsely arrested, wrongfully indicted, convicted and jailed after the publication of the BuzzFeed News article with false information included, who also lost a \$2.1 million default judgment without a liability trial to the child-molester's powerful attorney, Larry Crain, because I would not provide any information to the child-molester's powerful attorney, especially after threats and acts of vandalism taken against my family while Nashville Police stood down.

10. I personally printed my email exchanges with former BuzzFeed Reporter Andrew Kaczynski and BuzzFeed Chief Editor, Ben Smith, which are included as Exhibit 9.

11. On or about Feb 27, 2016, I personally attended a John Kasich Presidential Town Hall Rally with my Belmont University daughter, Daisy Davis. During the town hall rally, I personally had an exchange with Candidate John Kasich and I informed him about a child sex abuse cover-up here in Nashville. After the rally, Daisy and I personally spoke with Alex Thomas of the Kasich Campaign staff, and also to Belmont University Law Dean Alberto Gonzales, former U.S. Attorney General during the George W. Bush Administration. I personally sent emails to Alex Thomas and The Honorable Alberto Gonzales which are included as Exhibit 10.

12. My daughter has been banned, bullied and abused by Belmont Dean and Covenant Ruling Elder Dr. Bryce Sullivan. Covenant Member Attorney Worrick Robinson was, or still is, a Belmont Law School Adjunct Professor under the leadership of Belmont University Law Dean Alberto Gonzales. A photograph of Belmont University Dean Alberto Gonzales with Worrick Robinson's cousin is included as Exhibit 10.

13. To date, Belmont University Law Dean Alberto Gonzales, Gov. John Kasich, John Weaver, Alex Thomas, and John Kasich's 2016 Presidential Campaign have not followed up with me, or with my banned, bullied and molested daughter who graduated from Belmont University. Belmont University did respond to my daughter during her time as a student when she was issued a written warning for speaking out about the John Perry child-sex abuse cover-up to the women and girls of The Harpeth Hall School in Nashville.

14. I personally received an email from the account of Bass, Berry and Sims Attorney Bill Oozier. A copy of the email is included as Exhibit 11.

I declare under penalty of perjury that the foregoing is true and correct. Executed by me this 22<sup>nd</sup> day of February, 2021.

  
\_\_\_\_\_  
Willie Austin Davis – Citizen Appellant

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

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

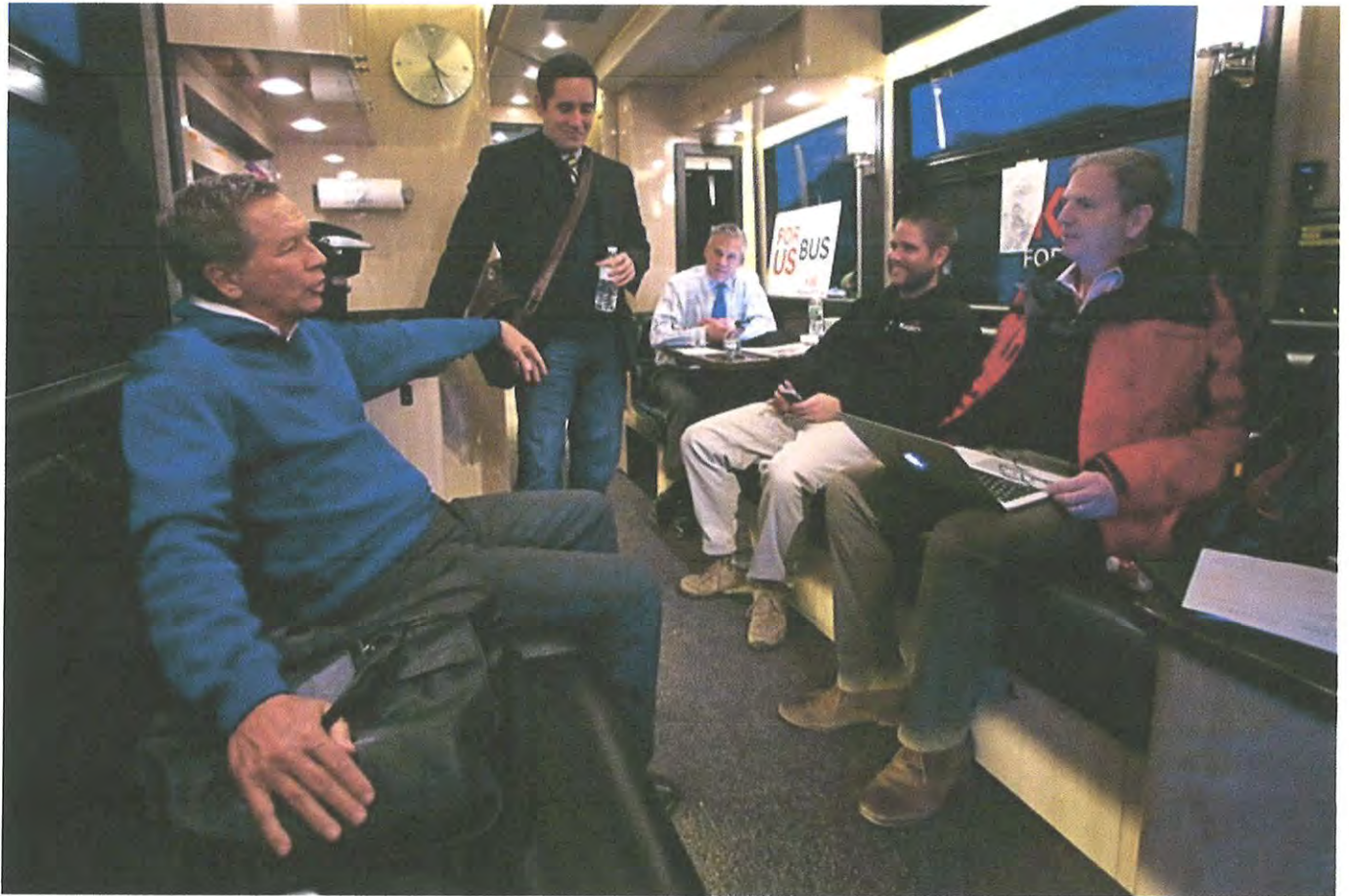
Sworn to and subscribed before me this 22 day of February, 2021.

Marquita Flournoy  
Notary Public

My commission expires: September 25, 2021



**Lincoln Project announces investigation into John Weaver allegations. The group made up of Republicans, became one of the leading anti-trump outfits during the campaign.**



**John Weaver, far right, sits in a campaign bus with then-Republican presidential candidate Ohio Gov. John Kasich on Dec. 20, 2016.** Charles Krupa / AP file - Feb. 12, 2021, 8:24 AM CST / Updated Feb. 12, 2021, 8:47 AM CST

By The Associated Press

The [Lincoln Project](#), one of the best-known and best-funded organizations in the so-called Never Trump movement, announced plans late Thursday to launch an external investigation to review the tenure of a co-founder accused of sexual harassment.

In a statement released Thursday evening, the organization announced that its board had decided to retain “a best-in-class outside professional” to review co-founder John Weaver’s tenure “to establish both accountability and best practices going forward for The Lincoln Project.”

The organization also encouraged anyone bound by a nondisclosure agreement to contact the Lincoln Project “for a release.”



#### [Lincoln Project condemns co-founder after allegations of sexual harassment](#)

The situation threatens the stature of not just the Lincoln Project but also the broader coalition of establishment-oriented Republican groups working to excise Trump from the party.

Lincoln Project co-founder Steve Schmidt insisted Wednesday night that he and the rest of the group’s leadership were not aware of any internal allegations of wrongdoing involving Weaver.

“The Lincoln Project believes the members of our movement and the victims of John Weaver’s despicable and deceptive behavior are owed the facts, and you will have them,” the organization said in a written statement Thursday night. “John Weaver betrayed all of us and you deserve the facts presented independently through a transparent process.”

In a statement released late last month to Axios, Weaver generally acknowledged misconduct and apologized.

“To the men I made uncomfortable through my messages that I viewed as consensual mutual conversations at the time: I am truly sorry,” he wrote. “They were inappropriate and it was because of my failings that this discomfort was brought on you.”



## **Former Kasich adviser takes \$350G job lobbying for Russia, registers as foreign agent: report** By [Danielle Wallace](#) | [Fox News](#)

A former campaign adviser for [John Kasich](#) has registered as a foreign agent to lobby against sanctions on [Russia](#) despite being a long-time critic of the Kremlin for [interfering in U.S. politics](#), according to a report.

**John Weaver was the top strategist on the 2016 presidential campaign of Kasich**, the Republican former governor of Ohio who has frequently been at odds with President Trump. Weaver claims he accepted a six-month contract worth \$350,000, plus expenses, to work for the foreign power because he wanted to defend America against what he described as Trump's "dangerous" [policies](#).

The former Kasich aide signed a contract last month to lobby Congress and the Trump administration on behalf of Tenam Corp., a subsidiary of the Rosatom, the Russian state-owned nuclear energy company, Politico reported.

News of Weaver's new job prompted backlash on social media, as the strategist had spent most of his career criticizing the Kremlin, most recently for its interference in the 2016 U.S. presidential election.

"You have got to be kidding me. This pathetic hack spent the last two years accusing everyone to his right of being a secret Russian agent, and now he's the one getting paid by corrupt Russians?" Sean Davis, co-founder of the Federalist, a conservative website, wrote Wednesday on Twitter.

But Weaver defended his new gig in a lengthy series of tweets late Wednesday. He claimed he took the job working for Russia because he feared Trump's "go-it-alone" policies would jeopardize U.S. national security interests, the U.S. economy and the world market.

"I know this is counter intuitive. Man bites dog. How could a Putin critic, someone with a single digit (and well earned) Trump enemy list # do this?" Weaver wrote. "The world is black and white, good and bad, right?"

“This wasn't an easy call. I've fought against Russia's attack on our democracy before almost anyone was paying attention,” Weaver continued. “We can't make the world more dangerous economy more unstable in order to feel good about taking on Trump.”

Weaver will lobby on “sanctions or other restrictions in the area of atomic (nuclear) energy, trade or cooperation involving in any way the Russian Federation,” according to a disclosure filing.

Though the contract does not specify which sanctions Weaver was hired to lobby against, the analyst referenced “uranium” on Twitter on Wednesday.

Sens. Lindsey Graham, R-S.C., and Bob Menendez, D-N.J., both proposed a bill in February that would limit the amount of uranium that could be imported from Russia beginning in 2021 as well as other sanctions. The legislation has not made it out of committee, [Politico reported](#).

“Time is of the essence in the Agreement,” the contract states, according to a copy filed with the Justice Department. The document contains an option to extend past the six months if necessary.

Weaver's former boss, Kasich, is also a long-time critic of the president. The former governor told “Fox News Sunday” in December that he was “actively thinking about” challenging President Trump in the 2020 Republican primaries.

Kasich would join former Massachusetts Gov. Bill Weld and current Maryland Gov. Larry Hogan as Republicans challenging Trump's 2020 bid. Kasich suspended his 2016 presidential run in May of that year after winning only his home state of Ohio, lagging far behind Trump in all major polls.

*Fox News' Gregg Re and Paul Steinhauser contributed to this report.*

The New York Times

***Men Accuse Lincoln Project Co-Founder of Online Harassment***

**John Weaver, a longtime G.O.P. operative who advised John McCain and John Kasich, made sexual overtures to young men, sometimes offering to help them get work in politics.**



John Weaver in 2016, when he worked on John Kasich's campaign for the Republican presidential nomination. Credit...Charles Krupa/Associated Press



By Maggie Astor and Danny Hakim

• Jan. 31, 2021

John Weaver, a longtime Republican strategist and co-founder of the prominent anti-Trump group the [Lincoln Project](#), has for years sent unsolicited and sexually provocative messages online to young men, often while suggesting he could help them get work in politics, according to interviews with 21 men who received them.

His solicitations included sending messages to a 14-year-old, asking questions about his body while he was still in high school and then more pointed ones after he turned 18.

These messages from Mr. Weaver, 61, who helped run John McCain's presidential campaigns in 2000 and 2008 and John Kasich's in 2016, did not lead to physical encounters except in one consensual case, and none of the men accused Mr. Weaver of unlawful conduct. Rather, many of them described feeling preyed upon by an influential older man in the field in which they wanted to work, and believing they had to engage with his repeated messaging or lose a professional opportunity.

Mr. Weaver sent overt sexual solicitations to at least 10 of the men and, in the most explicit messages, offered professional and personal assistance in exchange for sex. He told one man he would "spoil you when we see each other," according to a message reviewed by The New York Times. "Help you other times. Give advice, counsel, help with bills. You help me ... sensually."

Lincoln Project leaders, in their first extended comments about Mr. Weaver, said they had not been aware of such allegations until this month, when articles in [The American Conservative](#) and [Forensic News](#), and an [open letter](#) on Twitter from a data analyst named Garrett Herrin, accused Mr. Weaver of grooming young men online.

Steve Schmidt, a co-founder of the group, said its leaders had learned last summer from social media posts that Mr. Weaver, who has a wife and two children, might be involved in relationships with men, but emphasized, "There was no awareness or insinuations of any type of inappropriate behavior when we became aware of the chatter at the time." Mr. Weaver denied the claims, Mr. Schmidt said in an interview.

In mid-January, after the allegations gained public attention, Mr. Weaver issued a statement acknowledging he had sent "inappropriate" messages and apologizing "to the men I made uncomfortable," while saying he had believed all of his interactions to be consensual. He said he would not return to the Lincoln Project from a medical leave that began in the summer.

Interviews with the 21 young men, as well as a review of screenshots of dozens of messages he sent them over the last five years, show that his online behavior was in many cases aggressive and unwanted.

Cole Trickle Miele was 14 when he followed Mr. Weaver on Twitter in 2015 and quickly received a direct message from him. At first, he did not think anything was amiss.

“I remember being a 14-year-old kid interested in politics and being semi-starstruck by John Weaver engaging in a conversation with me,” said Mr. Trickle Miele, now 19. At the time, he supported the Republican Party and was a fan of Mr. Kasich, the Ohio governor whom Mr. Weaver was helping prepare to join the presidential race.

But as the messages kept coming, he became uncomfortable.

In June 2018, Mr. Weaver asked, “Are you in HS still?” — referring to high school — and Mr. Trickle Miele said that he was, and that he would be 18 the next spring. “You look older,” Mr. Weaver replied. “You’ve gotten taller.”

In March 2020, when Mr. Trickle Miele was 18, Mr. Weaver wrote, “I want to come to Vegas and take you to dinner and drinks and spoil you!!,” and in a follow-up message used a term that in sexual banter refers to one’s body: “Hey my boy! resend me your stats! or I can guess! if that is easier or more fun!”

Mr. Weaver, in response to questions about specific allegations, reiterated his statement from earlier this month and said: “I am so disheartened and sad that I may have brought discomfort to anyone in what I thought at the time were mutually consensual discussions. In living a deeply closeted life, I allowed my pain to cause pain for others. For that I am truly sorry to these men and everyone and for letting so many people down.”

Mr. Weaver was one of a handful of veteran Republican operatives who formed the Lincoln Project because, they said, they considered Mr. Trump a danger to the country. With mocking ads that often went viral, the group became a highly visible opponent to the Trump presidency.

Mr. Schmidt said in the interview that the Lincoln Project did not have an office when Mr. Weaver was involved, so the founders and staff were not together. He said the group was “outraged and horrified” to learn of Mr. Weaver’s behavior. After this article was published on Sunday, the Lincoln Project released a statement condemning Mr. Weaver and calling him “a predator, a liar and an abuser.”

Last year, when Cody Bralts was a recent college graduate looking for a job in politics, he replied to one of Mr. Weaver’s tweets and, to his surprise, received a direct message from him. After Mr. Weaver said he traveled to Chicago sometimes, they discussed meeting to talk politics; at one point Mr. Weaver asked what Mr. Bralts did in his free time.

When Mr. Bralts said he ran marathons, Mr. Weaver replied, “At least I know that whatever we end up doing, you could do it multiple times in a row,” with a winking emoticon.

“It just seemed like he was exploiting his power,” Mr. Bralts said. “He was someone very important and high up in a field I want to go into.”

Kyle Allen, 23, said that from 2016 to 2018, Mr. Weaver asked about his height, weight, what he was wearing and whether he was circumcised. He also pushed repeatedly for an invitation to speak at the University of Ottawa, where Mr. Allen was studying, using sexually explicit language to express his eagerness to visit.

“I would try to veer the conversations toward politics, and he would always find a way to bring it back to sexual stuff,” Mr. Allen said.

In at least two cases, Mr. Weaver offered young men work with the Lincoln Project while sending suggestive messages.

One of those men, Anthony Covell, 22, said Mr. Weaver had begun messaging him in July 2019. That exchange tapered off, but on Dec. 3, 2019 — two weeks before the Lincoln Project was publicly announced — Mr. Weaver invited him to join the new initiative.

“He said he was looking for young people who were creative and invested in this upcoming election,” Mr. Covell said, adding, “I was obviously interested.”

Mr. Weaver suggested that Mr. Covell “post a thirst trap” or “send me a pic,” then asked him to call for more details on the project.

“Something inside me was saying, ‘No, don’t do this, he seems kind of sketchy,’” Mr. Covell said.

He decided not to call.

Kitty Bennett contributed research.

## **Second minor accuses Lincoln Project's John Weaver of sexual harassment: New 'victim' comes forward to join boy, 14, and 20 other men who claim anti-Trump PAC's co-founder solicited sex in exchange for career advice**

- **Another minor has reportedly come forward to accuse the Lincoln Project's John Weaver of sexual harassment, weeks after 21 young men made similar claims**
- **Journalist Ryan Girdusky, who first broke the story about Weaver's alleged conduct, revealed the newest claim in an interview on Fox News**
- **The age of the alleged victim was not shared but is 'still a minor', Girdusky said**
- **Weaver is accused of 'aggressively sexually harassing' the minor on social media**
- **He further claimed that Weaver often contacted 'kids and young men' through Twitter and offer them jobs and internships 'in exchange for sexual favors'**
- **The bombshell allegation came just hours after the Lincoln Project shut down its fundraising page and announced it would be releasing staff from their NDAs**

By [LUKE KENTON](#) and [EMILY CRANE FOR DAILYMAIL.COM](#)

PUBLISHED: 01:18 EST, 16 February 2021 | UPDATED: 02:59 EST, 16 February 2021

Another minor has reportedly come forward to accuse the Lincoln Project's John Weaver of sexual harassment, just weeks after the political consultant was accused of harassing 21 others, including a 14-year-old boy.

In an interview with Fox News' Laura Ingraham on Monday night, journalist Ryan Girdusky, who first broke the story about Weaver's alleged conduct last month, shared news of the latest allegation for the first time.

'The New York Times report on January 31 that John Weaver was in communication with a 14-year-old was the first allegation made that he was sexually harassing a minor,' Girdusky began.

'I'm here to say I have made contact with another minor who was sexually harassed by John Weaver. He is still a minor today.

'The allegations involving minors [against Weaver] are now multiple and there's possibly more to come.'

Girdusky declined to divulge further details, but said he had seen alleged exchanges between Weaver, 61, and his newest accuser, which showed the Lincoln Project co-founder 'aggressively sexually harassing' the boy.

He further claimed that Weaver would often contact 'kids and young men' through Twitter and offer them jobs and internships 'in exchange for sexual favors'.

The bombshell allegation came just hours after the Lincoln Project shut down its fundraising page and announced it would be releasing current and former staff from non-disclosure agreements to allow them to speak out openly about their experiences working at the anti-Trump organization, amid the mounting scandals.



In an interview with Fox News' Laura Ingraham on Monday night, journalist Ryan Girdusky (right), who first broke the story about Weaver's alleged conduct last month, shared news of the latest allegation for the first time





**John Weaver, 61, left the anti-Trump PAC last month after it was publicly alleged he sexually harassed dozens of men, including some he offered professional support to in exchange for sex**

In a statement released Monday, the conservative political action committee (PAC) said they are investigating the claims against Weaver as part of a 'comprehensive review' of the company's operations and culture.

'We are committed to creating a positive, diverse, and inclusive workplace environment at The Lincoln Project and inappropriate behavior by anyone associated with the organization will not be tolerated under any circumstances,' the statement read.

'We have already taken decisive actions to address internal concerns.

'We are releasing staff and former staff from the confidentiality provisions in their employment agreements to discuss their workplace environment.'

Additionally, the Lincoln Project said it has enlisted the services of external legal counsel to 'strengthen our corporate governance, finance and operational structure, human resources, and leadership to position The Lincoln Project to further maximize our impact and lean into our important mission advancing democracy.'

The donation page on the Lincoln Project website is also no longer publicly accessible as of Monday and now leads to a page that reads: 'Inactive. This form is no longer available.'



## STATEMENT FROM THE LINCOLN PROJECT

"The Lincoln Project has retained the law firm of Paul Hastings to investigate allegations of inappropriate behavior by John Weaver as part of a comprehensive review of our operations and culture. The review process is currently underway.

"We are committed to creating a positive, diverse, and inclusive workplace environment at The Lincoln Project and inappropriate behavior by anyone associated with the organization will not be tolerated under any circumstances. We have already taken decisive action to address internal concerns. Additionally, we are releasing staff and former staff from the confidentiality provisions in their employment agreements to discuss their workplace environment. Based on the findings of this review we will take all necessary action to correct any issues or deficiencies that are identified.

"Concurrently, we are also working with outside counsel and professional consultants to strengthen our corporate governance, finance and operational structure, human resources, and leadership to position The Lincoln Project to further maximize our impact and lean into our important mission advancing democracy.

"The Lincoln Project was founded to combat political forces who seek to undermine our democracy. We revolutionized how political action committees operate and spent \$81 million last cycle to create and place more than 300 advertisements, host national town halls, conduct voter outreach, and launch a podcast and streaming video network that engaged millions of voters. Eighty percent of our funds went to voter content production. Our historic results speak for themselves.

"Moving forward, we have important work ahead of us and we have created a nationwide movement of Americans who support our objectives.

"In order to continue fulfilling our promise to our millions of supporters and contributors, we must address any and all internal organizational issues immediately and put in place a governance and diverse leadership structure that reflects our core values and ensures we will continue to attract the best talent available.

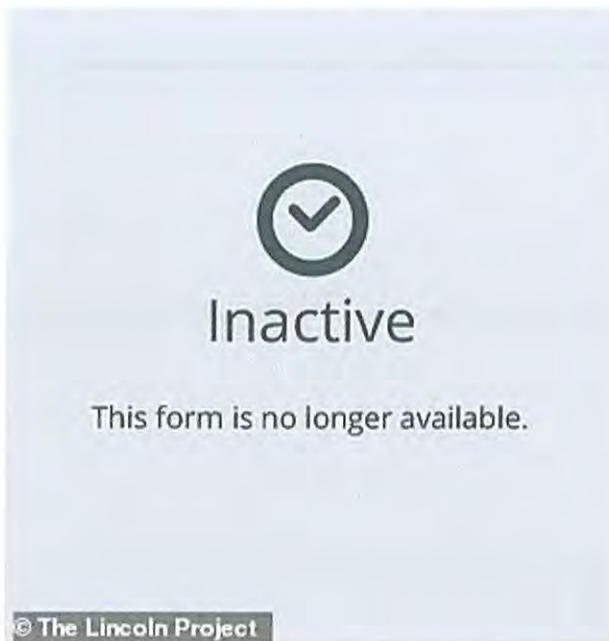
"The Lincoln Project will continue producing and distributing our popular content and commentary while these reviews are being conducted and we are operating at full capacity."

© The Lincoln Project

**In a statement released Monday, the conservative political action committee (PAC) said they are investigating the claims against weaver as part of a 'comprehensive review' of the company's operations and culture**

The anti-Trump PAC consisted of a group of Republican strategists working to unseat former President Donald Trump, after criticizing him in media appearances throughout his term.

However, the group imploded last month when more than 20 young men came forward to publicly accuse Weaver, 61, of sexual harassment over the last five years.



**The donation page on the Lincoln Project website is also no longer publicly accessible and now leads to a page that reads: 'Inactive. This form is no longer available'**

Among the accusers was Cole Trickle Miele, who was 14 when he first followed Weaver on Twitter in 2015.

Miele, now 19, said Weaver asked him questions about his body while he was still in High School, before his messages became more pointed after he turned 18.

Last week, two former Lincoln Project interns also came forward with lurid text messages from Weaver, who has since resigned from the organization.

The Lincoln Project previously released a statement on January 31 regarding Weaver's behavior, saying that he 'led a secret life that was built on a foundation of deception at every level.'

'He is a predator, a liar, and an abuser. We extend our deepest sympathies to those who were targeted by his deplorable and predatory behavior.'

'We are disgusted and outraged that someone in a position of power and trust would use it for these means.'

According to the Associated Press, Lincoln Project leaders were informed in writing and phone calls of at least 10 specific allegations of harassment against Weaver as early as last June, but reportedly failed to act.

Several members of the Lincoln Project, including co-founders Jennifer Horn and Steve Schmidt, have resigned amid the fallout.



**The Lincoln Project has had a tumultuous week after being rocked by sexual harassment allegations involving co-founder John Weaver and subsequent claims the group knew about it months before acknowledging it publicly**



**Jennifer Horn (right) is among the co-founders to have stepped down in recent weeks. Steve Schmidt (left), also a Lincoln Project co-founder, resigned on Friday. In his statement, Schmidt apologized to Horn and acknowledged playing a role in the public release of a series of private messages between her and the reporter a day earlier**

## **STATEMENT FROM THE LINCOLN PROJECT**

**February 11, 2021** - The Lincoln Project today released the following statement:

"Recently published stories about The Lincoln Project are filled with inaccuracies, incorrect information, and reliant exclusively on anonymous sources. However, there is a central truth in all of them that must be reckoned with and that is John Weaver's appalling conduct and the abuse he inflicted on people. The Lincoln Project Board decided this afternoon to retain a best-in-class outside professional to review Mr. Weaver's tenure with the organization and to establish both accountability and best practices going forward for The Lincoln Project. Out of respect for that process, we will have no further comment on issues related to Mr. Weaver during the review's pendency.

"The Lincoln Project is a movement made up of millions of followers, hundreds-of-thousands of donors, tens-of-thousands of volunteers, who stand for the preservation of the American Republic and the ongoing fight against the rising tide of authoritarian nationalism and political extremism. The Lincoln Project believes the members of our movement and the victims of John Weaver's despicable and deceptive behavior are owed the facts, and you will have them. John Weaver betrayed all of us and you deserve the facts presented independently through a transparent process.

"It is heart-breaking to read the accounts of his abuse. It disgusts us. It breaks our hearts. John's conduct has enabled the enemies of American democracy to unfairly and misleadingly attack us and we will not back down. Our expertise is in running political campaigns, we recognize that we need outside experts to help us understand, resolve, and rectify this matter.

"Furthermore, any person who believes they are unable to talk about John Weaver publicly because they are bound by an NDA, should contact The Lincoln Project for a release."

© Twitter

**The organization released a statement on Thursday night announcing that its board has decided to retain 'a best-in-class outside professional' to review Weaver's tenure 'to establish both accountability and best practices going forward for The Lincoln Project'**

Earlier Monday, nearly two dozen former and current staffers spoke to the 19th to reveal what they called the 'toxic' inner workings of the PAC.

Those who were interviewed have claimed that dissatisfaction has long been growing among more junior staff due, in part, to sexist and derogatory language used among those within the organization.

Some said that young male staffers were referred to as 'wizards', while female staffers were called 'girls'.

They also allege that political rivals were commonly called 'p\*\*\*\*es', 'c\*\*\*suckers' or 'f\*\*\*\*ts'.

Others complained that they believed language used in advertisements, including those targeting Ivanka Trump, was 'sexist'.

Multiple people who were interviewed by the 19th - a non-profit journalism group - said that the few women who were high up in the organization were treated differently to the men.

They say that the only female co-founder, Jennifer Horn - who is a former GOP chair in New Hampshire, was often left out of meetings and wasn't consulted on decisions or public statements put out by the organization.

Horn is among the co-founders to have stepped down in recent weeks. She says she left following revelations of Weaver's 'grotesque' behavior and divergent views with existing leadership about how to move forward.

The organization at the time claimed Horn left following a compensation dispute after they said she had asked for a \$250,000 signing bonus when her contract negotiations were underway.

Following her departure, the Lincoln Project's social media accounts posted a private message exchange Horn had with a reporter.



**The Lincoln Project announced plans late on Thursday to launch an external investigation to probe claims they knew about sexual misconduct allegations against Weaver (above in 2016) before he left the anti-Trump organization**

Republican strategist Steve Schmidt, also a Lincoln Project co-founder, resigned on Friday from the board following the tumultuous week.

In his statement, Schmidt apologized to Horn and acknowledged playing a role in the public release of the series of private messages between her and the reporter.

'I am resigning my seat on the Lincoln Project board to make room for the appointment of a female board member as the first step to reform and professionalize the Lincoln Project,' Schmidt wrote.

'I am not the daily manager of the Lincoln Project, but I am the senior leader. As the senior leader, it is my responsibility to set an example and to assume accountability,' he wrote.

'I would like to apologize to Jennifer Horn,' he continued. 'She deserved better from me. She deserved a leader who could restrain his anger.'

His statement came less than an hour after Horn's attorney sent a note to the Lincoln Project counsel informing them that they should preserve documents and communications in anticipation of litigation.

While he stepped down from the board, Schmidt is expected to maintain a role at the Lincoln Project.

His statement did not address what he or other leaders may have known about co-founder Weaver's misconduct before it became public late last month.

Schmidt had previously insisted that he and the rest of the group's leadership were not aware of any internal allegations of wrongdoing involving Weaver.

Only three of the board's eight co-founders now remain at the organization.



**Weaver - who has been married to his wife since 2007 - admitted last month that he was gay and apologized to the men he made 'uncomfortable' with his messages**



Weaver - who has been married to his wife since 2007 - admitted last month that he was gay and apologized to the men he made 'uncomfortable' with his messages.

'The truth is that I'm gay and that I have a wife and two kids who I love. My inability to reconcile those two truths has led to this agonizing place,' he said in an interview with Axios.

'To the men I made uncomfortable through my messages that I viewed as consensual mutual conversations at the time: I am truly sorry.

'They were inappropriate and it was because of my failings that this discomfort was brought on you.'

The Weaver allegations, as well as claims of infighting and a 'toxic' workplace at the organization, which has long claimed the moral high ground in its fight against Trump, has raised existential questions about the organization's future.

The Lincoln Project launched in November 2019 as a super PAC that allowed its leaders to raise and spend unlimited sums of money.

Since its creation, the Lincoln Project has raised \$90 million - more than \$50 million of which has gone to firms controlled by the group's leaders.

Its founders represent a who's who of prominent Republican strategists on cable television, including Schmidt and Reed Galen, both former advisers to John McCain; conservative attorney George Conway; former New Hampshire GOP chair Jennifer Horn; Florida-based veteran political ad maker Rick Wilson; and Weaver, who has long advised former Ohio Gov. John Kasich.

Backed by its founders' commanding social media presence, the organization quickly attracted a massive following of Trump critics in both parties that exceeded even its own founders' expectations.

# Steve Schmidt's Resignation Letter

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It was just a touch – a light one – and it lasted for only a moment. I was a 13-year-old boy at the Rock Hill Boy Scout Camp. His name was Ray, and he was the camp medic.

The older scouts called him 'Gay Ray,' and taunted and teased us about our inevitable encounter with him when the itch of the mosquito bites became too much to bear. It happened almost precisely like the older kids said it would.

Covered in bites, I went to the Medical Cabin. He told me to take my clothes off. I complied. He looked at my body and examined the bites, just like they said he would. He began applying an ointment just like they said he would.

I remember being paralyzed as his hands moved up my body and brushed over my penis. I remember all of this with perfect clarity up to the moment I was touched. The next part is fuzzier. I just know that I left.

Then, I came back to camp, and I must have had a look on my face because I remember the laughing. The look on my face must have looked familiar to the other boys because it was the same one they must have had when they returned from Ray's exam.

Camp continued, and I made sure never to return the Medical Cabin.

When I got home, I told my parents. The adults huddled, and the collective decision they made was to deal with it internally. He wasn't turned into the police because the consensus of the adults was that dealing with law enforcement would be traumatic for all of the boys involved.

In the end, we were told that Ray wouldn't return. I don't know what happened to him, and even when the day came that I had the power, money and ability to find out and do something to him, or about him, I chose not to.

Something else happened in that cabin that day. The extroverted little boy who walked in died; an introverted boy with deep trust issues walked out.

Before that day, I have no memory of ever feeling anger. After that day – and despite the passage of so many years – the anger has never left. It's always there; below the surface. It has risen up many times over the years.

Later in life that anger would immolate my faith in the Catholic Church. My faith had been diminished to a flicker of flame by the time I served in the White House.

I remember feeling like something that had anchored me was stolen. I felt lost in a strange way, though at the time, I would never have described myself as particularly religious.

I reached out to see if I could get an audience with the man who had presided over my Confirmation at St. Luke's Church in North Plainfield, New Jersey.

By this point, he was a Monsignor and the acting Auxiliary Bishop of the Metuchen Diocese. When I met with him in Washington, he was his Eminence Theodore Cardinal McCarrick.

Learning that the man I trusted to share my soul and the deepest memories of my violation was amongst the most prolific of the Catholic Church's sex criminals permanently shattered my faith and left me estranged from God.

It has taken nearly 16 years since that betrayal to find faith again, which I have during the process of my conversion to Judaism.

A touch on a table at age 13 that lasted seconds has been a defining event in my life. It never went away. That moment bequeathed me the three companions of my life that are always close and often present: anger, shame and depression.

Depression has always been the companion I feared the most, and it something I was too ashamed to admit I was struggling with. I found help in a most unlikely place: Curtis Houck is a writer for NewsBusters.

He attacks me and the Lincoln Project with fervor and glee, and yet one day he wrote bravely about his struggles with depression. When I read it, I felt like it was meant for me and I reached out to him to thank him. He saved my life and liberated me from a fear of seeking help.

I will always be grateful for his courage and I am talking about my struggle in an open way for the first time because maybe it will be the case that I can help just one person understand what I couldn't until I was almost 50 years old. It wasn't my fault.

I met a man for the first time in my life in late 2006. His name was John Weaver.

I met him at a fundraiser for Arnold Schwarzenegger where John McCain was the headliner at the end of the 2006 campaign. I arrived at that event with Arnold and I left with McCain.

Within months, under Weaver's leadership the campaign had collapsed and was bankrupt. During all the time I worked for John McCain I never heard a single person ever whisper that John Weaver was a predator.

I did not have a professional relationship with John Weaver again until December 2019.

I have said on the record that I learned about John Weaver's misconduct this past January. I know this is true, and I have certainty that the Lincoln Project independent investigation into John Weaver's conduct will validate this.

My purpose in writing this isn't to express what and when I knew about John Weaver, but how I feel about him, what he did and how many people he hurt.

This is my truth. John Weaver has put me back into that faraway cabin with Ray, my Boy Scout leader. I am incandescently angry about it. I am angry because I know the damage that he caused to me, and I know the journey that lies ahead for every young man that trusted, feared and was abused by John Weaver.

I know the shame, the guilt, the doubt, the depression and anger that lies ahead. I know John Weaver will be a life-long companion for them in the way that Ray has been for me.

I detest John Weaver in a way I can't articulate. My heart breaks that young men felt unseen and unheard in an organization that I started. I am ashamed of it.

I promise that we will release the full findings of what we discover through an independent investigation.

There is another truth about John Weaver of which I must speak. Like all predators, he is a skilled liar, and like all predators, he left clues.

I had the surreal experience in the last month of being grilled by a national newspaper about my knowledge of John Weaver's misconduct.

When I got off that call, I talked to another reporter from the same newspaper who said the newspaper has known for years.

Since John Weaver's misconduct was made public, I learned about another national reporter that was going to write about Weaver, but then was ultimately dissuaded to do so by Weaver because he had told the reporter that his cancer had returned, and he had just six months to live.

I was asked by a reporter if I thought the heart attack he told us about was real. The truth is: I don't know. I responded by saying I don't know if he lives in Texas. I just know that he is a liar and a predator, and I wish our paths never crossed. Unfortunately, they did.

I wish John Weaver was not a co-founder of the Lincoln Project, but as hard as I wish for that to be, I can't change that he was. I am enormously proud of the Lincoln Project and what we have accomplished to-date.

I believe we built the most successful and politically lethal SuperPAC in history. We built a movement with millions of people, and we played a decisive role in Donald Trump's defeat.

During these last weeks, I have been consumed by anger and rage as I have seen the attacks from the rancid collection of liars, thugs and fascists, including Donald Trump Jr. and Laura Ingraham, attack the Lincoln Project, my character and the character of my friends over John Weaver's amoral predations.

I am in a tough business, and I know what I signed up for. I am long past the moments of fear that gripped me when FBI agents showed up at my house to tell me I was on the hit list of the Trump bomber.

The truth is that these attacks awakened all of my old companions at once – shame, anger and depression. For those around me, it is the anger that has been most visible. For those who love me, it has been the depression.

Either way, it has not brought out my best self. I am not the daily manager of the Lincoln Project, but I am the senior leader. As the senior leader, it is my responsibility to set an example and to assume accountability.

I would like to apologize to Jennifer Horn. I let my anger turn a business dispute into a public war that has distracted from the fight against American fascism. Jennifer was an important and valuable member of our team.

Truth be told, I didn't interact with Jennifer very often, but I always enjoyed the occasions when we did. She deserved better from me. She deserved a leader who could restrain his anger. I am sorry for my failure.

Yesterday, I was shown correspondence between Jennifer Horn and Amanda Becker, a reporter at The 19th News. I was told it came from an anonymous source.

That direct message should never have been made public. It is my job as the senior leader to accept responsibility for the tremendous misjudgment to release it.

I apologize on behalf of the organization to both Jennifer Horn and Amanda Becker. I woke up this morning, and realized I've been fighting for a long time. It's taken a toll. I'm tired.

Presently, the Lincoln Project board is made up of four middle-aged white men. That composition doesn't reflect our nation, nor our movement.

I am resigning my seat on the Lincoln Project board to make room for the appointment of a female board member as the first step to reform and professionalize the Lincoln Project.

The Lincoln Project was built to fight. It is my deepest hope that, despite the recent internal events that have distracted from our cause, you will entrust in us to continue to fight for what the entire Lincoln Project movement believes in: combatting the rising tide of fascism and authoritarianism in this country.

We are one election away from seeing the end of American democracy. This fight will go on for the rest of my life.

For me, it's time to step back from the front – to get healthy mentally, physically and spiritually. I look forward to being on Real Time with Bill Maher tonight on HBO, and then to taking some much-needed time off.

Stay strong. There is much work to be done.

Steve

# Kasich taps two veteran advisers for expected presidential campaign

By [Dan Balz](#) - Chief correspondent - **June 9, 2015** at 9:05 p.m. CDT

Ohio Gov. John Kasich (R) has tapped a pair of veteran Republicans to play senior roles in his upcoming presidential campaign, according to multiple sources. The decisions are the latest steps in preparation for a formal announcement of candidacy that will come sometime next month.

**Kasich has picked John Weaver, a former top adviser in the presidential campaigns of Arizona Sen. John McCain, to fill the role of senior strategist.** The Texas-based Weaver will oversee the general strategic direction of the Kasich campaign.

Meanwhile, Fred Davis, a California-based ad maker, will assume the duties as lead media consultant for Kasich's super PAC. He too worked for McCain's 2008 campaign. Davis and Weaver both worked in behalf of former Utah governor Jon Huntsman Jr. in the 2012 campaign.

Kasich was drawn to Weaver and Davis in part because of the work they did previously for another Midwestern Republican governor, Michigan's Rick Snyder, according to one knowledgeable Republican. Weaver is a hard-charging strategist who does not shy away from the rigors of a tough campaign. Davis is known as one of the most creative and sometimes offbeat ad makers in the Republican Party. Both have been through controversies in past campaigns.

In a message Tuesday night, Weaver described Kasich as a "conservative problem solver," adding, "John Kasich is a proven winner, at the ballot box and in tackling the tough problems facing America. If he chooses to move forward, I will work my guts out to help him and am proud to be part of a great team already with him."

The hiring of Weaver and Davis, along with the previously announced recruitment of pollster Linda DiVall, provides Kasich with experienced hands atop his campaign operation. The three will work with a team of longtime Kasich advisers who have been building an organization for many weeks.

Kasich has spent the past several months touring the early states, testing receptivity to his message, and has been in California, New York and elsewhere assessing whether he can raise the necessary money to run a competitive campaign in a crowded GOP field.

Aides said two weeks ago that they had set a series of financial targets and expected to meet or better them by the end of the month. The hiring of Weaver and Davis, who have been in talks for several weeks about senior roles, is the latest sign that Kasich is on track for his announcement next month.

The Ohio governor won reelection by an overwhelming margin last fall. He previously served for 18 years in the House, where he was chairman of the Budget Committee and helped bring about the first balanced budgets in a generation.

Kasich is a fiscal conservative who prides himself on projecting a different image for his party. He will join a field of candidates that already includes a large crop of current and former governors, including former Florida governor Jeb Bush and Wisconsin Gov. Scott Walker.

Unlike Bush and Walker, Kasich is far down in the pack, according to early polls. His advisers expect that his announcement will begin to boost his standing.

# Houston Chronicle

## Southern Baptist head calls for reforms, potential removal of multiple Houston churches

Robert Downen, Houston Chronicle - Feb. 18, 2019 Updated: Feb. 19, 2019 4:59 p.m.



Southern Baptist Convention President J.D. Greear speaks to the denomination's executive committee Monday, Feb. 18, 2019, in Nashville, Tenn. Days after a newspaper investigation revealed hundreds of sexual abuse cases by Southern Baptist ministers and lay leaders over the past two decades, Greear spoke about plans to address the problem. **(AP Photo/Mark Humphrey)** Mark Humphrey/Associated Press

NASHVILLE, Tenn.— The president of the Southern Baptist Convention on Monday evening called for a "season of lament, sorrow, and repentance" over a sexual abuse crisis, and provided a list of 10 churches, including Second Baptist Church in Houston, that he said should be scrutinized for their handling of sexual abuses and potentially removed from the nation's largest Baptist group.

Two of the other 10 churches are in Houston in addition to Second Baptist, a 60,000-member congregation that has long been pastored by former SBC President Ed Young. The other churches are Brentwood Baptist Church and Cathedral of Faith.



The 10 churches are as follows:

- Second Baptist Church, Houston, Texas
- Brentwood Baptist Church, Houston, Texas
- Cathedral of Faith, Houston, Texas
- Arapaho Baptist Church, Garland, Texas
- Bolivar Baptist Church, Sanger, Texas
- First Baptist Church, Bedford, Texas
- Sovereign Grace Church, Louisville, Kentucky
- Turner Street Baptist Church, Springdale, Arkansas
- Eastside Baptist Church, Marietta, Georgia
- Trinity Baptist Church, Ashburn, Georgia

"Brothers and sisters, there is a problem," current president J.D. Greear said at a speech to other SBC leaders in Nashville. "This is not a fabricated story made up by people with a secular agenda. We've not taken reports of abuse in our churches as seriously as our gospel demands, and sometimes even worse, outright ignored or silenced victims."

"It's time we back up our words with actions."

A spokesman for Second Baptist declined comment Monday. The pastors of Brentwood and Cathedral of Faith could not immediately be reached.

Among the actions Greear said he will take: More resources for churches to deal with sexual abuse; more background checks for SBC leadership groups and entities; and changes to the SBC bylaws that would allow for the removal of churches that show a "wanton disregard for sexual abuse."

The SBC president stressed that "every option is on the table," including a registry of convicted or credibly accused church leaders and volunteers. That registry has long been requested by survivors of sexual assault and activist groups, and has recently gotten the support of multiple other SBC figures.

Greear's speech came days after the Chronicle and San Antonio Express-News found hundreds of SBC church leaders and volunteers had faced criminal charges and convictions since 2008, when leaders rejected reforms such as a database. All told, since 1998, roughly 380 Southern Baptist church leaders have been accused of sex crimes or misconduct. They had more than 700 victims.

Some predators, the newspapers found, were able to operate without oversight or legal scrutiny for years thanks, in part, to Baptist policy that says every church is self-governing and autonomous.

But in his Monday speech, Greear stressed that autonomy was not an excuse for inaction.

He also called on an SBC work group to "take the necessary steps to determine if 10 churches identified in the Chronicle's report still "meet the standards of having a faith and practice which closely identifies" with that of the Convention.

"I am not calling for disfellowshipping (expelling from the SBC ) any of these churches at this point but these churches must be called upon to give assurance to the SBC that they have taken the necessary steps to correct their policies and procedures with regards to abuse and care for survivors," Greear said. "Our goal here is never disfellowship, but correction."

Houston's Second Baptist was at the center of two of the newspapers' stories regarding claims that they mishandled or concealed sexual abuses. The church has denied those allegations.

In January the church provided a one-page statement response to questions from the Chronicle for its investigative series "Abuse of Faith."

Second Baptist stated it "takes allegations of sexual misconduct or abuse very seriously and constantly strives to provide and maintain a safe, Christian environment for all employees, church members and guests... our policy and practice have been and will continue to be that any complaint of sexual misconduct will be heard, investigated and handled in a lawful and appropriate way."

Others in the SBC - including heads of seminaries and entities - have called for a third-party registry of convicted or credibly accused pastors and church workers. Such an idea was struck down in 2008 in part because SBC leaders could not force churches to report such information to a registry.

But in the wake of the newspapers' reporting, there's been a growing call for drastic action.

Thom Rainer, CEO of the SBC's publishing arm LifeWay resources, told the Chronicle that his organization does not currently provide materials for how churches can assist victims of sexual abuse, something Rainer called a "mistake we need to correct, and that we will correct."

He also said that background checks for ordination, ministerial or informal staff candidates have been almost non-existent both at churches and entities he's helped lead, an issue he said LifeWay plans to spearhead as soon as possible.

Rainer is one of multiple SBC entity heads who told the Chronicle that they support some sort of registry.

"I think this is the loudest I've ever heard it, (and) from the most influential sources," he said. "That is absolutely huge. We've definitely had people advocating it up to this point, but it has never been at the crescendo that it is now."

'A safe place'

Women whose lives were affected by sexual abuse committed by former Second Baptist employees expressed hope that the call for investigating the Houston megachurch might help make a difference in the future.

Gwen Casados' daughter Heather was only 14 when she was sexually molested in a choir room at Second Baptist in 1994 by a church employee. Casados said she received a call from Young who initially offered to do whatever he could to help her daughter. But after she told Young she had already called police, he hung up. She said her daughter suffered more because church leaders seemed to take the employee's side against the victim.

Casados told the Chronicle that she hopes a formal review will convince Young and others to "take responsibility for these things happening and stand up against these people."

"I think they should take the responsibility of listening to the child and not to the predator."

Nicole for years belonged to Second Baptist Church's Cypress campus, where she was one of several teenagers who were groomed and sexually harassed by former youth pastor Chad Foster.

She also welcomed news that her former church may be scrutinized for its inaction to response to pleas she and others made on behalf of all of Foster's victims, including youth group members who never went to the police and those who did. "It sounds like this is making waves and that is what we need. It seems like people are talking about it now – and before no one was talking about this."

Foster is now a registered sex offender. Second Baptist was civilly sued over sex abuse allegations involving Foster.

The pastor of Brentwood Baptist church, another church on Greear's list, has been sued three times for allegations that he or another pastor sexually harassed adults, court records show. Two civil cases involved parishioners he counseled; at least one was settled.

Houston's Cathedral of Faith, The Church of New Beginnings, also appears on the list. It was founded by a pastor who is also a registered sex offender.

In an abundance of caution, the identity of John Perry's child sex abuse victim #1 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. REDACTED = [REDACTED]

## Isotoria Ministries Blog — June 11, 2015

### Child Abuse, Statute of Limitations, and John Perry



Buzz Feed news reporters Andrew Kaczynski and Ilan Ben-Meir published a story yesterday entitled [Co-Author of Mike Huckabee Books Was Accused of Child Molestation in Two Legal Cases](#). Using public documents, including court papers and police reports, the reporters revealed affidavits alleging child sexual abuse against Nashville author John Perry, a co-author and/or contributor to books authored by famous evangelicals, including Mike Huckabee, John MacArthur, and Richard Land. A Nashville police spokesman, responding to queries from Buzz Feed, said: "The alleged sexual battery was reported to have occurred when the victim was between the ages of 11 and 14."

Then the Nashville police spokesman Don Aaron elaborated:

"As a result of the investigation, the allegations of sexual battery were sustained, but it was determined that the statute of limitations had tolled, barring prosecution."

It is Don Aaron's next statement that startled me:

"The victim was age 18 when [REDACTED] first disclosed the allegations to non-law enforcement and said at that time [REDACTED] did not want the matter reported to the Tennessee Department of Children's Services or the police."

Read that again: "The victim was 18 when [REDACTED] first disclosed the allegations to non-law enforcement."

I spoke to the victim over a year ago. [REDACTED] read an article that I wrote and reached out to me via email. Later we spoke by phone. Like all victims of child abuse, [REDACTED] has been traumatized. [REDACTED] does not wish to be re-victimized by [REDACTED] story going public. I explained to [REDACTED] that it was my desire to protect [REDACTED] identity, but the reason there are mandatory reporting laws is because child abuse is a crime against society.

The victim initially reported [REDACTED] abuse to non-law enforcement in the summer of 2007. [REDACTED] was going into [REDACTED] senior year of high school. [REDACTED] abuser was repeatedly confronted by church authorities, and finally,

allegedly confessed to his crimes. John Perry was then allowed to resign from his position as an officer of [Covenant Presbyterian](#) in Nashville in July of 2008.

The Buzz Feed article reports that the Metropolitan Nashville Police Department "launched an investigation in 2012 and found the allegations against Perry were sustained" -- now let this next sentence sink in -- "but it was determined that the statute of limitations had tolled, barring prosecution."

In 2012 the Metropolitan Police Department "launched its investigation."

In 2007 the victim first disclosed [REDACTED] abuse to non-law enforcement.

5 years.

5 years after the abuse was first reported.

In those five years a teenage [REDACTED] crosses the threshold of adulthood to turn 21-years-of-age. It's like having the fire alarm triggered *after* the house has burned down. It's like posting a warning sign on a washed out bridge *after* the car has been swept down the river. It's like city officials sounding the tornado alarm *after* the town has been blown away.

And here is what seems even more bizarre about this John Perry story. The person who reported the child abuse to the police in 2012--in order that the police could "launch their investigation"-- was [a man named Austin Davis](#). There's an axiom in dysfunctional families and covenant relationships that those who report the problem often become the problem.

I'm sure, like all police departments, the [Metropolitan Nashville Police Department](#) depends on city attorneys for legal counsel, and will on occasion consult with their specialized police attorneys. There are a few questions that reporters, bloggers, and advocates for victims of child sexual abuse should be asking.

(1). [The Tennessee Code of Law](#) indicates that [the statute of limitations](#) for sexual battery of a minor which occurs between July 1, 1997 - June 2006 is when the victim reaches **the age of 21**. When the police spokesman says "the statute of limitations had tolled," was that date of limitation the summer of 2007 when the abuse was first reported? No? Okay, then was it the summer of 2008 when the alleged child abuser was allowed to quietly resign his position at the church with no explanation? No? Okay, was it 2010 when Covenant Presbyterian ex-communicated John Perry for "...committing heinous and repetitive sin against [REDACTED]"? No? Okay, was it 2012 when the police "launched their investigation"? When did the statute of limitations run out? If it is possible to withhold information from police until the statute of limitations runs out, and the alleged perpetrator cannot be prosecuted, it seems that might be incentive for friends and loved ones to cover, hide and suppress any allegations of child sexual battery? That's why we have mandatory reporting laws. I don't pretend to know the answers, I just have some good questions that should be asked.

(2). If some of the "non-law enforcement" were church officials *to whom the victim reported [REDACTED] abuse when [REDACTED] turned eighteen*, it seems a legitimate and fair question to ask if those church officials sensed **any obligation** to file a mandatory report to the Metropolitan Nashville Police Department and the [Tennessee Department of Children's Services](#) in either 2007 or 2008 when they were first informed of the abuse by the victim. It does *seem* as if Covenant church officials knew of the child abuse when John Perry was allowed to quietly resign in 2008 and then "ex-communicated" in 2010 for "...committing heinous and repetitive sin against [REDACTED] (without) evidence of repentance" (Source: Covenant church

minutes). However, to be fair, reporters need to ask this question to Covenant Presbyterian officials:  
"When did you first find out about the alleged child abuse?"

(3). Finally, child abuse seems to be an epidemic in our country. While we all have empathy for the victim, the bigger question that needs to be asked is simply this: "Has everyone in Nashville, Tennessee, from the police, judges, church officials, lawyers, and civic leaders taken the proper steps in following all state and federal laws in regards to allegations of child sexual battery?"

It's definitely time to do the right thing.

Posted by [Wade Bureson](#) at [Thursday, June 11, 2015](#)

Attorney Larry Crain rejected representing the Davis Family in 2009 and chose instead to aggressively participate in an on-going Mann Act Federal crime cover-up in possible violation of Attorney Professional Standards of Conduct, and also in possible violation of Federal Law. There is **NO** statute of limitations for child sex abuse across state lines in violation of the Federal Mann Act. See the letter Attorney Larry Crain sent to the Davis Family in 2009 at The Silent Bell web site by selecting **More Information:** <https://www.thesilentbell.org/>

# Nashville ghostwriter sues Christian publisher over new Billy Graham biography

**Holly Meyer** - The Tennessean – Published 4:59 p.m. CT May 2, 2018 – Updated 8:09 p.m. CT May 2, 2018



A Nashville ghostwriter is suing a Christian publisher for \$3 million over its release of "Through My Father's Eyes," the new Billy Graham biography told from the perspective of the late evangelist's famous son.

In the federal lawsuit filed Tuesday, HarperCollins Christian Publishing is accused of reneging on their contract to pay John Perry royalties on the book authored by Franklin Graham and Donna Lee Toney.

The biography was released Tuesday by Thomas Nelson, a Nashville publisher now owned by HarperCollins.

In a statement, Brentwood attorney Larry L. Crain, who is representing Perry, called the lawsuit filed in the U.S. District Court in the Middle District of Tennessee a simple breach of contract case.

"Mr. Perry is a talented author who performed his part of the bargain and was cut out of his royalties when Thomas Nelson elected to go with a lesser-known author," Crain said.

HarperCollins Christian Publishing did not immediately respond to the USA TODAY NETWORK - Tennessee's request for comment.

The lawsuit says Perry, who has written more than 30 books including "Letters to God," came up with the idea for the biography. Perry first pitched it to one of Franklin Graham's representatives and then again in 2006 to Thomas Nelson, which HarperCollins acquired in 2015.

Perry signed a contract with Thomas Nelson in October 2006 that promised Perry a \$100,000 writer's fee and a 2 percent commission on sales of the book, the lawsuit says. It was amended in 2007 to include a \$12,000 advance that Perry received.

For the book, he traveled with and interviewed Franklin Graham, who is the CEO and president of Samaritan's Purse and the Billy Graham Evangelistic Association. Later, Thomas Nelson told Perry that Franklin Graham was not happy with the manuscript and the publisher took him off the project.

The lawsuit says the news of Franklin Graham's displeasure shocked Perry, so he wrote to him.

"Mr. Graham responded expressing concern that Mr. Perry was taking credit for the book idea that Thomas Nelson had originated and pitched to him," the lawsuit reads. "Mr. Perry then sent a second letter to Mr. Graham pointing out that he (Mr. Perry) had come up with the idea for the book and sold Thomas Nelson on the idea."

Police investigated Perry in October 2012 after learning that a ██████ said he sexually abused █████ between the ages of 11 and 14, Metro police spokesman Don Aaron said.

"Allegations of sexual battery were substantiated" by investigators, Aaron said. Charges could not be filed because the statute of limitations had passed.

The lawsuit makes no mention of the investigation or other civil legal action related to the allegations.



The lawsuit makes no mention of the investigation or other civil legal action related to the allegations.

In February, Perry reached out to a Thomas Nelson executive about selling his royalties for a agreed upon lump sum, the lawsuit says. Thomas Nelson told Perry he did not have a claim to the royalties since he was replaced as the writer of the book.

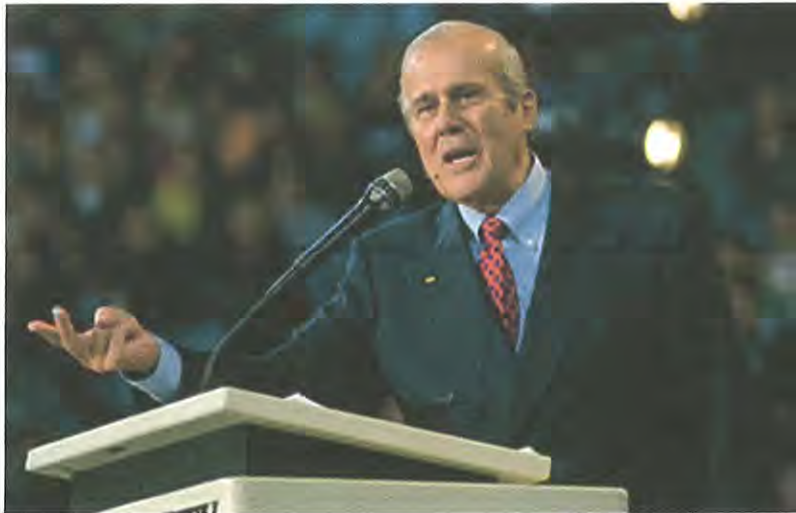
Billy Graham died in February. In the run-up to the book's release, Franklin Graham has been promoting "Through My Father's Eyes" online and in the national media.

In a promotional video, Franklin Graham explains how Sam Moore of Thomas Nelson encouraged him to write a book about the lessons he learned from his father. Franklin Graham says in the video that he started the process 12 years ago.

"Through the years, Sam kept asking, 'Have you written that book yet? Don't wait too long,'" Franklin Graham said. "I've written about my father's journey and what I've learned through his eyes and what I've tried to put into practice."

# Loyal friend of LU and former Thomas Nelson Publishers CEO leaves lasting legacy

June 4, 2018 : By Liberty University News Service



Sam Ziady Moore, who served as president of Thomas Nelson Publishers for nearly 47 years and was one of Liberty University's earliest supporters, died on Friday, June 1, at age 88.

**Liberty president Jerry Falwell and his wife, Becki, attended the funeral visitation at Covenant Presbyterian Church in Nashville on Wednesday.**

Deryl Edwards, Liberty's director of advancement operations and analytics, called Moore "a pioneer in Christian publishing" and said Moore was instrumental in the growth and funding of the university. When Liberty was just forming, Thomas Nelson provided Bibles and Christian books as gifts to tens of thousands of people who financially supported Liberty.

"They meant a lot to those who supported our school in the very beginning, and we appreciate the stand that Sam Moore took over the years in spreading the Gospel," Edwards said.

Duke Westover, a member of Liberty's Board of Trustees who served as executive assistant to Liberty's founder, Dr. Jerry Falwell, for nearly 35 years, said Moore and Falwell were "dear, dear friends."

"Sam Moore's legacy touched millions of people through the publishing of the Bible and books by other pastors, including Billy Graham. Thomas Nelson published most all of Jerry Falwell's early books and those he offered over television for donations, including dozens of reference books," Westover said.

Westover added that Moore had a positive effect on the lives of everyone he encountered: "He just loved people, and he loved the Bible, and he loved God."

Westover last visited Moore and his wife, Peggy, at their home in February. "He was in great spirits, and he and I sat and talked about old times with Dr. Jerry Falwell."

President Falwell said Moore was a true example of a Champion for Christ, impacting the world through his profession.

“Sam and Peggy Moore were among my parents’ best friends,” he recalls. “I remember them vacationing in Acapulco together in the 1970s, and my parents almost always vacationed within driving distance. Sam Moore’s company even awarded me a scholarship to cover my tuition at the University of Virginia Law School in the 1980s.

“As a young man, I was always encouraged by Sam Moore to do great things,” Falwell continued. “He wanted Liberty University to succeed in the next generation, and he bolstered my confidence in ways that nobody else could. I respected him greatly because of his success in business. When I began working as an attorney for Liberty, Sam helped Liberty survive when it was struggling financially in the 1990s by forgiving debt that Liberty owed his company in the 7 figures.

“When a competing publisher won the rights to publish my father’s autobiography by paying Dad one of the first \$1 million advances in history in 1987, I remember Sam saying he didn’t mind losing the business because he was happy to see \$1 million transferred from the other publisher, a secular company, to his good friend, Jerry Falwell. He and Dad had much in common — they were both geniuses when it came to business, and they also both loved people. We will all greatly miss Sam.”

Moore’s [obituary](#) states that he was “a devoted husband, father, grandfather, great-grandfather, mentor, friend and prominent businessman,” who “loved his family, friends, former employees and associates. He was a proud American and loved the freedom his chosen country provides to all its citizens.”

Moore was born Oct. 25, 1929, in Beirut, Lebanon, and immigrated to the United States in 1950. He attended Columbia International Bible College and the University of South Carolina, working his way through school by selling Bibles door-to-door. He founded National Book Publishers in 1958 and incorporated Royal Publishers in 1961 before purchasing Thomas Nelson Publishers in 1969. Under his leadership, Thomas Nelson became the largest publisher of Christian books and Bibles in the world, publishing the New King James Version of the Bible in 1983.

# The Guardian

## Jerry Falwell Jr 'enjoyed watching' his wife have sex, alleged lover says

**Giancarlo Granda says Liberty University head, who quit over sex scandal, knew of his relationship with Becki Falwell 'from day one'**



Giancarlo Granda: 'Towards the end of my work shift, she's like: Hey would you wanna go back to my hotel room? And then she's like: But my husband wants to watch.' Photograph: Jonathan Ernst/Reuters

**Adam Gabbatt**

**@adamgabbatt**

Fri 28 Aug 2020 09.50 EDT

Giancarlo Granda, the man at the center of a sex scandal involving Jerry Falwell Jr, detailed on Friday how the evangelical leader and outspoken ally of Donald Trump "enjoyed watching" his wife and Granda having sex.



Jerry Falwell Jr confirms he has resigned from Liberty University

In [an interview with ABC News](#), Granda said he met Becki Falwell and Jerry Falwell, who [resigned](#) as president of the Christian, uber-conservative Liberty university this week, at a hotel in Florida in 2012.

Granda, who was 20 at the time, said a relationship developed, which centered around him and Becki Falwell having sex while Jerry Falwell was in the room.

“He was aware from day one of our relationship, and he did in fact watch,” Granda said.

Falwell, one of the most influential evangelical figures in the US whose [endorsement of Donald Trump](#) in 2016 helped the president win the Republican primary, has had a remarkable fall from grace over the course of August.

Falwell resigned from the university on 24 August, after Granda first went public with his story, [telling Reuters](#) he had a years-long sexual relationship involving the Falwells.

Speaking to ABC’s Good Morning show Granda gave a detailed account of the relationship.

Granda, 29, said he was working the Fontainebleu hotel when he met Becki Falwell.

“I’m talking to some guests and I notice this woman behind me, staring at me, and she was noticeably drunk. And she was just flirting with me, and then we start flirting back and forth,” Granda said.

“Towards the end of my work shift, she’s like: ‘Hey would you wanna go back to my hotel room?’ And as a single 20-year-old I’m like yeah, of course.

“And then she’s like: ‘But my husband wants to watch.’

Granda said: “Immediately I thought it was a bit strange, and I backed off. [Then] she’s like: ‘Oh no, he’s not going to do anything. He’s just gonna sit in a corner and he wants to watch and it’s his thing.’”

An initial sexual encounter developed into a years-long relationship with the couple, Granda told Reuters, with he and Becki Falwell having sex “multiple times a year” while Jerry Falwell watched.

Falwell would later go into business with Granda, buying a Miami hostel.

After Reuters published the interview with Granda on Monday, Falwell denied he was part of the trysts, and suggested his wife had an affair. “Becki had an inappropriate personal relationship with this person, something in which I was not involved,” Falwell said in a statement.

The news also emerged as Politico [published](#) a story alleging that Becki Falwell had had a sexual encounter with a former Liberty University student, who was a band mate of her son.

Liberty University, which was founded by Falwell’s televangelist father in 1971, is known for its strict rules over students’ relationships.

“Sexual relations outside of a biblically ordained marriage between a natural-born man and a natural-born woman are not permissible at Liberty University,” the university’s honor code reads.

In a statement to Politico Liberty University reiterated that it has “... policies against employees having sexual relationships with students, as well as having other inappropriate relationships outside of marriage, whether consensual or not”.

In a statement provided to the Washington Examiner, Falwell said the couple had retained a relationship with Granda to try to suppress the relationship. He also accused Granda of attempting to extract “substantial monies” and claimed, without offering evidence, that Granda “may have targeted other successful women”.

Granda told ABC: “That’s false. That’s ridiculous. That’s just them trying to smear me.”

## The Dallas Morning News

### Billy Graham moves membership from First Baptist Dallas

By Sam Hodges – 4:15 pm on Dec 29, 2008 CST

After more than half a century as a member of the First Baptist Church of Dallas, the Rev. Billy Graham has switched his membership to a church closer to his home in the North Carolina mountains.

The famed evangelist, 90, was voted in as a member of the First Baptist Church of Spartanburg, S.C., on Sunday.

The Rev. Robert Jeffress, pastor of First Baptist Dallas, said he had been contacted by Mr. Graham's personal assistant in recent days about the membership switch.

"We'll always treasure the relationship," Dr. Jeffress said.

Mr. Graham joined First Baptist Dallas during his first crusade in the city, held at the Cotton Bowl in 1953. First Baptist Dallas was then led by the Rev. W.A. Criswell, and was widely considered the preeminent church in the Southern Baptist Convention.

But the globe-trotting evangelist has never lived in Dallas, and visited the church only rarely through the years.

Mr. Graham has long lived in Montreat, N.C., and is essentially home-bound there now. He watches TV broadcasts of First Baptist Spartanburg services.

The pastor of First Baptist Spartanburg, the Rev. Don Wilton, has preached for the Billy Graham Evangelistic Association and has ministered to the evangelist in recent years.

"He has been faithfully visited by Dr. Wilton, whom he refers to as his 'TV pastor,'" said Larry Ross, a spokesman for Mr. Graham.

Mr. Ross added, "This was not an easy or quick decision by Mr. Graham, but he increasingly felt it was important to unite with First Baptist Spartanburg, as that has had his attention and focus, especially through television, in recent years."

The evangelist has relayed to Dr. Jeffress his "love and appreciation" for First Baptist Dallas and Dr. Jeffress' ministry, Mr. Ross said.



# BuzzFeed News

## Co-Author Of Mike Huckabee Books Was Accused Of Child Molestation In Two Legal Cases

Prominent Christian author John Perry, who has also co-authored a book with Alabama Supreme Court Justice Roy Moore, has been accused of child molestation in two separate lawsuits. **Updated with Perry's statement at the bottom**



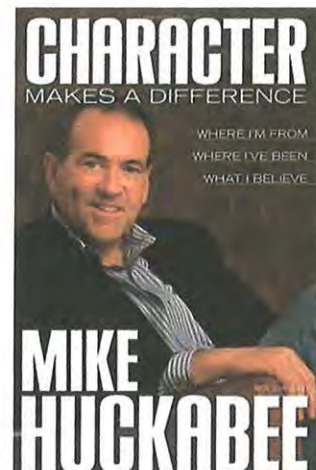
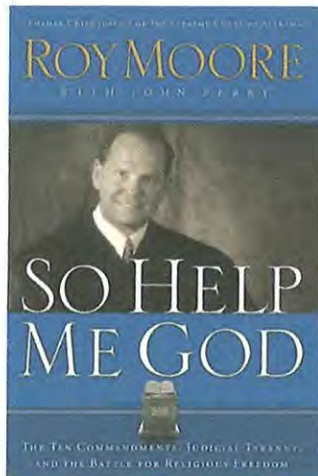
Andrew Kaczynski BuzzFeed News Reporter



Ilan Ben-Meir BuzzFeed News Reporter

Reporter

Posted on June 10, 2015, at 10:24 p.m. ET



John Perry, a prolific author who co-wrote two books with former Arkansas governor and presidential candidate Mike Huckabee and co-wrote one with Alabama Supreme Court Justice Roy Moore, was accused of child molestation in two separate lawsuits, BuzzFeed News has found.

A 2012 police investigation of Perry's alleged offenses found that "the allegations of sexual battery were sustained" but that the statute of limitations had expired.

Perry co-wrote *Do the Right Thing: Inside the Movement That's Bringing Common Sense Back to America* about Huckabee's 2008 presidential campaign. He also did research and writing for Huckabee's 2007 book *Character Is the Issue*, a memoir of his early time as governor. Perry also co-wrote *So Help Me God*, Moore's autobiographical account of fighting to keep a monument to the Ten Commandments at Alabama's Supreme Court.

Those books are just a few of the titles produced with Perry's help: He wrote *For Faith & Family: Changing America by Strengthening the Family* with Richard Land, the president of Southern Evangelical Seminary, a book with former Southern Baptist Convention president James T. Draper, as well as a book with Frank Page, the president and CEO of the Southern Baptist Convention Executive Committee. Perry even co-authored The Vow, the book made into a feature film starring Rachel McAdams and Channing Tatum. Perry also lists writing two books for prominent pastor John F. MacArthur on his website.

In a sworn affidavit submitted during divorce proceedings, Perry's ex-wife attests that she "filed for divorce as a result of Mr. Perry's inappropriate marital conduct, to which he admitted to in his Response to Interrogatories numbers 1 and 2." Throughout the court documents, "inappropriate marital conduct" appears to be a euphemism for the alleged molestation.

Perry's responses are not included in the case file.

Another filing, submitted by Perry's ex-wife's attorney earlier in the same proceedings, refers to Perry's "admitted sexual abuse" of a minor child. Perry's response to that filing — also submitted prior to his ex-wife's affidavit — does not deny the abuse, or that Perry admitted it. Instead, Perry claims that "there was never any testimony or other evidence of any kind presented" to the court, "or any orders or findings of fact [...] regarding any alleged sexual abuse of any minor child ████████ to the parties' divorce or any other legal proceeding."

This claim is not, however, necessarily incompatible with Perry's ex-wife's claim that Perry "admitted to" the alleged "inappropriate marital conduct" during the discovery process, because it appears that those findings were not technically "presented" to the court.

Likewise, a police investigation launched in 2012 found the allegations against Perry "were sustained," according to a police department spokesperson, but that statute of limitations had passed.

"The alleged sexual battery was reported to have occurred when the victim was between the ages of 11 and 14," said Nashville police department spokesperson Don Aaron in a statement to BuzzFeed News.

"As a result of the investigation, the allegations of sexual battery were sustained, but it was determined that the statute of limitations had tolled, barring prosecution. The victim was age 18 when [REDACTED] first disclosed the allegations to non-law enforcement and said at that time [REDACTED] did not want the matter reported to the Tennessee Department of Children's Services or the police."

In a second series of lawsuits brought in a county court in Tennessee, and related to the same alleged acts of child molestation, Austin Davis, a former parishioner of Covenant Presbyterian Church in Nashville, claims that the church covered up Perry's alleged acts of child molestation and launched a campaign to silence and harass Davis.

Inquiries to Covenant Presbyterian were forwarded to their attorney. Autumn Gentry, a lawyer for Covenant Presbyterian, told BuzzFeed News they can't comment on ongoing litigation.

The individual Perry allegedly molested told BuzzFeed News that [REDACTED] believed that the church reacted appropriately, and did not cover up Perry's alleged offense. Perry has not returned multiple requests for comment from BuzzFeed News.

In an affidavit submitted as part of his case, Austin Davis claims the accuser told him that [REDACTED] had been molested between the ages of 11 and 13.

In Davis's court case, he presents what he alleges are minutes from Covenant Presbyterian Church meetings that show Perry resigning from the church's diaconate in 2008, and minutes from 2010 showing Perry was excommunicated from the church because he "has confessed to committing heinous and repetitive sin [...] and has not shown evidence of repentance." The minutes appear to have been introduced as evidence in one of Davis' lawsuits against the church. The church does not appear to have objected to the introduction of the minutes or contested their authenticity.

BuzzFeed News spoke to a longtime church member, who said he had obtained the minutes for Davis and vouched for their authenticity. The minutes are accessible to any church member. The individual Perry allegedly molested also told BuzzFeed News that Perry was excommunicated from the church as a consequence of the alleged abuse.

Catherine Davis, the wife of Austin Davis, likewise wrote in a sworn affidavit that during the summer of 2012, she spoke to the accuser, who confirmed the abuse occurred numerous times when the individual was a minor. Davis said the accuser told her that broke [REDACTED] silence in 2007 and began telling friends, family members, church leaders, and school officials about what had allegedly occurred.

Spokespeople for Huckabee did not return a request for comment.

*Megan Apper and Christopher Massie contributed reporting.*

**Update: John Perry gave the following statement to the *Daily Mail*:**

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.

**SIXTH CIRCUIT COURT  
DAVIDSON COUNTY, TENNESSEE**

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

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

\_\_\_\_\_

Plaintiff / Appellee

CERTIFIED  
Transcript  
Of  
Cause

Appearance No. \_\_\_\_\_  
CIRCUIT COURT

DESIGNATED RECORD

VS

No. M2018-\_\_\_\_\_-COA-R3-CV

COURT OF APPEALS

TRANSMITTED ON:

1-4-19

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

APPEALED  
TO  
Next Term,  
20

AUSTIN DAVIS

Defendant / Appellant

**DEPOSITION**

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IN THE SIXTH CIRCUIT COURT  
FOR THE TWENTIETH JUDICIAL DISTRICT OF TENNESSEE

[REDACTED]	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. [REDACTED]
	)	
AUSTIN DAVIS,	)	
	)	
Defendant.	)	

---

Videotaped Deposition of  
CAROLYN CONE  
Taken on behalf of the  
Plaintiff  
September 11, 2018  
1:14 p.m.

Reported by:  
Harpeth Court Reporters  
Franklin, Tennessee  
Ariela Pastel, LCR, CSR

EX7

FILED

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

SEP 19 2018

RICHARD R. ROOKER, Clerk  
By *Messing* Deputy

[REDACTED]

VS

**AUSTIN DAVIS**

FILED

JAN 22 2019

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

Deposition of

**CAROLYN CONE**

*September 11, 2018*

**H**

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Ex7

vs AUSTIN DAVIS  
Deposition of CAROLYN CONE on 09/11/2018

Page 2

1 APPEARANCES:  
 2 For the Plaintiff:  
 3 MR. LARRY L. CRAIN  
 Crain, Schuette & Associates  
 4 5214 Maryland Way  
 Suite 402  
 5 Brentwood, Tennessee 37027  
 615.376.2600  
 6 Larry@csafirm.com  
 7  
 For the Defendant:  
 8  
 MR. AUSTIN DAVIS, PRO SE  
 9 5211 Park Avenue  
 Nashville, Tennessee 37209  
 10 valglenn18@aol.com  
 11  
 ALSO PRESENT:  
 12  
 Carrie Leigh Willis, Videographer  
 13  
 14  
 15  
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Page 4

I N D E X

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 2  
 3 EXAMINATION BY:  
 4 MR. CRAIN 5  
 5 MR. DAVIS 21  
 6  
 E X H I B I T S  
 7 Exhibit 1 - Research brief entitled "Sexual  
 Revictimization" 16  
 8  
 Exhibit 2 - Photograph of Carolyn Cone 18  
 9  
 Exhibit 3 - Cost sheet of psychotherapy for  
 10 [REDACTED] 20  
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Page 3

1 The videotaped deposition of CAROLYN CONE, taken  
 2 on behalf of the Plaintiff, on September 11, 2018, at  
 3 the offices of Crain, Schuette & Associates, 5214  
 4 Maryland Way, Suite 402, Brentwood, Tennessee 37027,  
 5 for all purposes under the Tennessee Rules of Civil  
 6 Procedure.  
 7 The formalities as to caption, certificate, et  
 8 cetera, are waived. All objections, except as to the  
 9 form of the questions, are reserved to the hearing.  
 10 It is agreed that Ariela Pastel, being a  
 11 Certified Court Reporter for the state of Tennessee,  
 12 may swear the witness, and that the reading and  
 13 signing of the completed deposition by the witness was  
 14 not discussed.  
 15  
 16 \* \* \*  
 17  
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 24  
 25

Page 5

1 THE VIDEOGRAPHER: Okay. This is the  
 2 video deposition of Carolyn Cone on September the  
 3 11th, 2018, at the time reflected on the screen, which  
 4 is 13:14 p.m. The full introduction has been waived.  
 5 Court reporter, would you please swear in the witness.  
 6  
 7 CAROLYN CONE,  
 8 was called as a witness, and after having been first  
 9 duly sworn, testified as follows:  
 10  
 11 E X A M I N A T I O N  
 12 BY MR. CRAIN:  
 13 Q. Good afternoon, Ms. Cone. I'm Larry Crain. I  
 14 represent [REDACTED] in this case that's pending in  
 15 the Circuit Court of Davidson County. With us today  
 16 is the videographer and court reporter. Also  
 17 Mr. Davis is joining us here today, and he'll have an  
 18 opportunity after I'm done to certainly ask any  
 19 questions that he may have.  
 20 This deposition is being taken for proof and  
 21 will be introduced at the trial of this case later  
 22 this month.  
 23 You understand that; right?  
 24 A. Yes, sir.  
 25 Q. And this is done because you are unable due to

EXT



vs AUSTIN DAVIS  
Deposition of CAROLYN CONE on 09/11/2018

Page 6

1 your schedule -- you're going to be actually out of  
 2 the country, as I understand it?  
 3 A. I am.  
 4 Q. So we'll try and keep this short and to the  
 5 point, and I appreciate your willingness to be here  
 6 today to furnish this testimony.  
 7 Let's begin, if we could, by having you state  
 8 your full name, please.  
 9 A. My name is Caroline Post Cone.  
 10 Q. And, Ms. Cone, do you practice here in the  
 11 middle Tennessee area?  
 12 A. I do. I have a private practice, and I also  
 13 am on faculty in the Department of Internal Medicine,  
 14 the Center For Professional Health. I'm considered a  
 15 consultant there.  
 16 Q. What is your educational background? Do you  
 17 mind summarizing that for the jury?  
 18 A. I received a Bachelor of Science in Nursing  
 19 from Calvin College. I received a Masters of Science  
 20 in Nursing from Vanderbilt University. I graduated  
 21 Calvin College 1988, and Vanderbilt University 1990.  
 22 Q. And would you tell us whether you are at this  
 23 time a licensed nurse for the State of Tennessee?  
 24 A. Yes, I am.  
 25 Q. What other licenses, if any, do you hold?

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1 A. So I hold a registered nurse license, and I  
 2 hold an advanced practice nurse license. And then I  
 3 also have a certification, and that's a specialty in  
 4 child and adolescent psychiatric mental health nurse.  
 5 Q. Would you mind explaining for the benefit of  
 6 those of us who may not know the difference, what are  
 7 the differences between a licensed registered nurse  
 8 and a licensed advanced practical nurse?  
 9 A. So a registered nurse is someone who has been  
 10 educated, usually they have a bachelor's degree in  
 11 nursing. Sometimes they have an associate's degree,  
 12 and those nurses are under a doctor's order. An  
 13 advanced practice nurse has more independent practice.  
 14 And so for me, I'm a nurse psychotherapist and that's  
 15 my advanced practice. I operate a little more  
 16 independently.  
 17 Q. As a nurse psychotherapist, what are the  
 18 typical types of patients that you on a day-to-day  
 19 basis are helping?  
 20 A. So I see patients who have anxiety disorders,  
 21 depressive disorders, sometimes attention deficit  
 22 disorder. I see folks who have marital struggles,  
 23 parenting struggles, any of those kinds of things;  
 24 occasionally people who have mood disorders, bipolar,  
 25 those kinds of things.

Page 8

1 Q. I see. So you had mentioned your  
 2 certification, is that a national certification?  
 3 A. It is. It's through the American Nurses  
 4 Credentialing Center, the ANCC.  
 5 Q. In addition to your practice and the years  
 6 that you have been in practice, have you held any  
 7 teaching positions?  
 8 A. I have. I worked at Vanderbilt, taught  
 9 nursing at both the -- so there are two years to the  
 10 Vanderbilt program. Typically, the first year is your  
 11 RN degree, and then the second year is your advanced  
 12 practice nurse degree. You come in with a bachelor's  
 13 in a related field or an unrelated field to begin  
 14 with. And so I have taught in both of those years. I  
 15 have taught for 13 year. Then I also taught for one  
 16 semester at Belmont in the nursing program as well.  
 17 Q. And how long have you been in practice  
 18 altogether now in the area of psychological therapy?  
 19 A. Since 1989. So almost 30 years. I guess  
 20 that's 29 years.  
 21 Q. 30 years. Okay. And what portion of your  
 22 practice involves, would you think, counseling people  
 23 who suffer from some type of sexual trauma or  
 24 sexual-related issue?  
 25 A. I would -- I said earlier 50 percent, probably

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1 somewhere between 50 percent and 70 percent of my  
 2 practice are sexual-related issues.  
 3 Q. I'd like to turn your attention now to one  
 4 patient in particular, [REDACTED]. And to begin,  
 5 I'd like to ask you to direct your attention back to  
 6 April of 2008 when you first began treating [REDACTED].  
 7 Would you mind, Ms. Cone, summarize for the  
 8 jury, if you would please, the type of psychological  
 9 issues for which [REDACTED] began seeing you originally?  
 10 A. So when [REDACTED] came to me, [REDACTED] and [REDACTED]  
 11 came into my office for their first appointment. But  
 12 I was initially contacted by an outside party saying,  
 13 "Do you have room? Could you see this person?"  
 14 [REDACTED] and [REDACTED] came and we were working with  
 15 [REDACTED] on issues of post-traumatic stress disorder and  
 16 anxiety disorder, some eating disorder issues that [REDACTED]  
 17 was having related to the trauma of having been  
 18 sexually molested by [REDACTED].  
 19 Q. Now, in layman's terms -- you used this term,  
 20 post-traumatic stress disorder or PTSD, as we  
 21 sometimes refer to that. I'm familiar as an attorney  
 22 with what that means, but there may be those on the  
 23 jury who are not as familiar. Could you describe that  
 24 particular diagnosis?  
 25 A. Post-traumatic stress disorder is a

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vs AUSTIN DAVIS  
Deposition of CAROLYN CONE on 09/11/2018

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1 constellation of symptoms that demonstrate that  
 2 somebody gets stuck in a traumatic experience. So  
 3 being stuck for somebody who has been sexually abused  
 4 would be they would have symptoms of being unable to  
 5 attach, maybe have hypervigilance, things like that,  
 6 because they're stuck in this cycle of being scared  
 7 and fearful.  
 8 Q. Do you recall a time around October of 2012  
 9 when you received a phone call from a detective with  
 10 Metropolitan Police Department?  
 11 A. I do.  
 12 Q. And what was the purpose of his call?  
 13 A. He called me because he said that there was an  
 14 investigation that there had been a complaint about --  
 15 that this sexual abuse case had not been handled  
 16 appropriately, and so he wanted to meet with me at  
 17 that time. And actually, I wouldn't -- I didn't talk  
 18 to him until I first talked to my client to make sure  
 19 that it was okay that I talked to him.  
 20 Confidentiality.  
 21 Q. Sure. Sure. When you talked to [REDACTED]  
 22 and said that you had been contacted by the police  
 23 department here, Metro, do you recall [REDACTED] initial  
 24 reaction?  
 25 A. So actually [REDACTED] called me --

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1 Q. Okay.  
 2 A. -- and said, "Hey, this detective is going to  
 3 call you," and [REDACTED] was -- the not-so-technical term is  
 4 [REDACTED] was wiggling out. But [REDACTED] was just completely  
 5 anxious and totally upset, very distraught, and really  
 6 did not want to see the detective except in a session  
 7 with me.  
 8 Q. Did you accommodate the police at that time  
 9 and agree to meet with your client and them in your  
 10 office?  
 11 A. Yes, sir.  
 12 Q. And describe that meeting, if you would,  
 13 please?  
 14 A. So the detective came to my office and [REDACTED]  
 15 came to my office, and the three of us sat around and  
 16 it was probably a good two and a half hours. And we  
 17 just -- he asked all of his questions, discussed the  
 18 case from the beginning to the end. It was very -- it  
 19 was very anxiety-provoking. It was very traumatic to  
 20 revisit everything all over again.  
 21 Q. So in terms of your own observations during  
 22 that meeting with the detective, what did you observe  
 23 with respect to [REDACTED] in terms of whether [REDACTED]  
 24 held back or attempted to conceal any information from  
 25 the police?

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1 A. [REDACTED] was completely open and honest. And all  
 2 of the things that [REDACTED] had told me in therapy were the  
 3 exact same things that [REDACTED] told the detective as well.  
 4 Q. Are you aware of any effort by [REDACTED]  
 5 since you've been treating [REDACTED] since 2008, of any  
 6 effort by [REDACTED] to involve [REDACTED] in the  
 7 conspiracy to cover up any information or conceal from  
 8 the authorities any information about [REDACTED] childhood  
 9 trauma?  
 10 A. Not at all.  
 11 Q. Before the public statements began and the  
 12 posts on the Internet by Mr. Davis recounting the  
 13 events from [REDACTED] childhood, how would you  
 14 have described [REDACTED] progress in terms of [REDACTED] emotional  
 15 and mental progress from your treatment starting in  
 16 2008? Was [REDACTED] gaining on [REDACTED] demons or was [REDACTED]  
 17 regressing?  
 18 A. [REDACTED] was actually making progress. It's  
 19 challenging to make progress in that area, and  
 20 actually we had been making progress. And the  
 21 progress centered around not being defined by being a  
 22 victim but being defined as being a human and having  
 23 thoughts and dreams and purposes and things like that  
 24 that were separate from this event that happened to  
 25 [REDACTED].

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1 Q. How would you describe [REDACTED] efforts just  
 2 overall in terms of the diligence or effort being put  
 3 forward by [REDACTED] to come to grips with [REDACTED] past?  
 4 A. Well, I would say -- I'd seen [REDACTED] for 90  
 5 sessions since October of 2012, and that would  
 6 indicate that someone wants to get better.  
 7 Q. Do you have an opinion, Ms. Cone, based on a  
 8 reasonable degree of medical certainty, what the  
 9 effects were on [REDACTED] mental or emotional health  
 10 when the defendant in this case began publicizing to  
 11 people at [REDACTED] church or government officials, events  
 12 from [REDACTED] childhood trauma?  
 13 A. Yes, I do have an opinion.  
 14 Q. Could you state that opinion, please.  
 15 A. Yes. My opinion is that my client regressed,  
 16 became more anxious, and we went back -- [REDACTED] was  
 17 revictimized is really what happened. We went back,  
 18 back, way back to 2008, where we were when we had been  
 19 trying to process all of the things that had happened  
 20 to [REDACTED].  
 21 Q. You use the term just now, revictimization.  
 22 And I'm sure that's a term of art that you as a  
 23 therapist use in your area of specialty, but could you  
 24 describe for us what is meant by revictimization?  
 25 A. So revictimization has to do with a victim who

Ex 1

vs AUSTIN DAVIS  
Deposition of CAROLYN CONE on 09/11/2018

Page 14

1 has had an experience, and then what happens is that  
 2 through either, whatever means, they become  
 3 revictimized, so they relive this experience, have all  
 4 of the same symptoms again, and we kind of regress in  
 5 therapy. So they go back to an earlier level of  
 6 functioning which is usually less mature, and we have  
 7 to start over again. We have -- not necessarily start  
 8 over again, but we have to start back at square one  
 9 and rebuild on what has happened earlier.  
 10 Q. Can being confronted as an adult with  
 11 publicity concerning an area of your childhood that  
 12 was traumatic, generate any type of phenomena in terms  
 13 of psychological phenomena for that adult?  
 14 A. Absolutely.  
 15 Q. Can you describe --  
 16 A. Absolutely.  
 17 Q. -- what -- I mean what types of phenomena or  
 18 reactions or conditions can occur from being  
 19 revictimized?  
 20 A. Well, so what happens is that then we revisit  
 21 this whole thing about -- for [REDACTED], for [REDACTED], what  
 22 ended up happening is [REDACTED] became the victim again. So  
 23 instead of being a human and getting to have [REDACTED] hopes  
 24 and dreams and making progress in life, [REDACTED] became a  
 25 sexual abuse victim as [REDACTED] identity again.

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1 And there was a lot -- then the external world  
 2 -- all sorts of folks knew, and sometimes people would  
 3 ask [REDACTED] about it or [REDACTED] would get on social media and  
 4 [REDACTED] would see something and it would be about [REDACTED], and  
 5 it was very traumatizing for [REDACTED]. [REDACTED] would come in  
 6 my sessions [REDACTED] would be shaking, and we would have to  
 7 bring it down. We'd have to do some breathing,  
 8 mindfulness, those kinds of things. It was very  
 9 traumatic.  
 10 Q. Are adults who are exposed early in life to  
 11 trauma, be it sexual trauma or physical trauma, more  
 12 or less susceptible later in life to feelings of  
 13 negative emotions or shame, or when confronted with  
 14 reminders of that event in their past, is that a  
 15 common phenomena?  
 16 A. Absolutely, yes.  
 17 Q. Are there articles or studies in your area of  
 18 expertise that deal with this phenomenon of  
 19 revictimization?  
 20 A. Yes, sir.  
 21 Q. I'd like to show you one in particular and ask  
 22 you if you're familiar with this. And I have a copy  
 23 to give to Mr. Davis.  
 24 MR. CRAIN: But would you mark this as  
 25 Exhibit 1 for me, please.

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1 (Exhibit 1 was marked for identification.)  
 2 BY MR. CRAIN:  
 3 Q. I'd like to hand you what's been marked as  
 4 Exhibit 1. Ms. Cone, take your time and tell me if  
 5 you are familiar with this article in particular.  
 6 A. Yes, sir.  
 7 Q. And is this the kind of material that you in  
 8 the course of your practice from time to time rely  
 9 upon in treating patients?  
 10 A. Yes, sir. Absolutely.  
 11 Q. And the title of this article is "Sexual  
 12 Revictimization," and it appears to be a research  
 13 brief. I've only highlighted one sentence from it on  
 14 the first page on my copy, and I'd ask if you would  
 15 please read that for us aloud for the jury?  
 16 A. "Numerous studies suggest that sexual  
 17 victimization in adolescence significantly increases  
 18 the likelihood of sexual victimization in adulthood.  
 19 Studies suggest that sexual victimization in childhood  
 20 or adolescence increases the likelihood of sexual  
 21 victimization in adulthood between 2 and 13.7 times."  
 22 Q. Thank you. In your treatment and counseling  
 23 and therapy of [REDACTED], what has been your  
 24 experience with regard to the impact or effect of  
 25 this, to use your term, "revictimization," on [REDACTED]

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1 progress over the last few years?  
 2 A. So I would say that what happened is it caused  
 3 some regression in progress. So not only are we not  
 4 making forward progress, we're also regressing some in  
 5 terms of [REDACTED] treatment progress.  
 6 Q. Have you counselled with [REDACTED] about the  
 7 effects of being confronted with texts or e-mails or  
 8 public SoundCloud audio posts by Mr. Davis in the  
 9 terms of how [REDACTED] can deal with being confronted with  
 10 this information?  
 11 A. Absolutely. Absolutely.  
 12 Q. Does the fact that [REDACTED] name doesn't always  
 13 appear in these posts matter?  
 14 A. In this case, it doesn't matter. [REDACTED] case is  
 15 so specific that [REDACTED] felt like that everything that  
 16 was said in those social media posts was -- that [REDACTED]  
 17 would be easily identified.  
 18 Q. Are you personally aware, Ms. Cone, of some of  
 19 these postings? Have you had an opportunity from time  
 20 to time to see some of them yourself?  
 21 A. Well, actually what's happened to me is that I  
 22 have had people, acquaintances of mine, call me. Even  
 23 [REDACTED] has called me and said, "Do you know that  
 24 your name is on such and such, or that your voice is  
 25 actually -- there's a tape of you talking?"

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█ vs AUSTIN DAVIS  
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1 So that has happened to me several times by  
2 several people. I would get an e-mail, I'd get a  
3 phone call. "Hey, do you know that you're on the  
4 Internet?"  
5 Q. Let me show you -- we'll have this marked as  
6 Exhibit 2 to your testimony.  
7 (Exhibit 2 was marked for identification.)  
8 BY MR. CRAIN:  
9 Q. I have a copy for you as well. I'm going to  
10 hand you Exhibit 2. Take your time. Do you recognize  
11 who is depicted in that photograph?  
12 A. Yes, sir.  
13 Q. Who is that?  
14 A. Me.  
15 Q. Did you on an earlier occasion furnish  
16 testimony in this case as an expert witness?  
17 A. Yes, sir.  
18 Q. And are you aware or have you been made aware  
19 of the fact that your photograph and description of  
20 your testimony in that earlier hearing has been posted  
21 by Mr. Davis on the Internet?  
22 A. Yes, sir. I was made aware of it by several  
23 people. I think it's creepy.  
24 Q. All right. And I have blacked out the name,  
25 but are you aware that that, an identifying name, was

Page 19

1 used as well in making that post?  
2 A. Yes, sir.  
3 Q. Ms. Cone, when your client, █, saw  
4 a photograph of █ therapist and the description of  
5 █ therapist's testimony on sensitive issues dealing  
6 with █ childhood past, did that have an impact on  
7 █ -- when █ saw them on the Internet being posted?  
8 A. It was unnerving to █; anxiety-producing.  
9 Q. Is there, in your opinion, based on a  
10 reasonable degree of medical certainty, is there a  
11 likelihood that if this continued activity, that, by  
12 that I mean, the widespread publicity being given to  
13 █ childhood sexual trauma -- if that  
14 continues, do you have an opinion as to whether or not  
15 that will further exacerbate or cause irreparable  
16 injury to █ mental and emotional condition?  
17 A. I think that it would have a deleterious  
18 effect on █; very negative effect.  
19 Q. And do you have an opinion, again based on a  
20 reasonable degree of medical certainty, as to whether  
21 the widespread publicity through various e-mails,  
22 Internet postings, and accusations of █ involvement  
23 in some type of cover-up scheme have caused any  
24 revictimization or exacerbation of █ childhood  
25 sexual trauma?

Page 20

1 A. Yes, they have.  
2 Q. Do you have an opinion, again based on a  
3 reasonable degree of medical certainty, as to whether  
4 or not this widespread publicity have caused █  
5 to suffer emotionally or mentally?  
6 A. Yes. Yes, they have. Yes, they have.  
7 Q. Have you at my request prepared a statement of  
8 your services in your treatment of █ since these  
9 public statements began being made by Mr. Davis?  
10 A. Yes, sir. In fact, I believe it was since the  
11 first call from the detective.  
12 Q. And let me hand you a copy of that statement,  
13 and ask you if this is a true and accurate total of  
14 your services in treating █ during that  
15 timeframe?  
16 A. Yes, sir.  
17 MR. CRAIN: Let me mark that then as  
18 Exhibit 3.  
19 (Exhibit 3 was marked for identification.)  
20 BY MR. CRAIN:  
21 Q. And I would ask you if you have an opinion  
22 based on a reasonable degree of medical certainty as  
23 to whether or not these charges are reasonable based  
24 upon those charges from the national medical  
25 community?

Page 21

1 A. Yes, sir, those are reasonable.  
2 Q. And were they necessary to the treatment of  
3 █ based on your opinion and again, based on a  
4 reasonable degree of medical certainty?  
5 A. Yes.  
6 Q. Have all the opinions that you've expressed  
7 here today been based on a reasonable degree of  
8 medical certainty?  
9 A. Yes, sir.  
10 MR. CRAIN: No further questions.  
11 MR. DAVIS: I get to ask questions?  
12 MR. CRAIN: If you have questions for  
13 her.  
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 █; that's correct?  
25 A. Yes, sir.

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Page 22

1 Q. In the injunction hearing, [redacted] answered the  
2 question that [redacted] had been meeting with you for ten  
3 years, so that would take it back to 2006.  
4 Did you ever counsel with [redacted] before?  
5 A. No, sir, we started in April of 2008.  
6 Q. April 2008. Okay. And in the injunction  
7 hearing, you said that Larry Ferris was the one that  
8 contacted you from Covenant.  
9 A. Uh-huh.  
10 Q. So how did it all come about? What is it  
11 exactly that happened because you got contacted before  
12 and then met with [redacted] and [redacted] after?  
13 A. Well, so what happened is Mr. Ferris called me  
14 on the phone and said, "Hey, we have something that  
15 just came up in our church. Do you have room for a  
16 new client?" And I said, "Yes, I do." And he told me  
17 a little bit about what had happened. And so then we  
18 made the appointment, and who came to the first  
19 appointment was both [redacted] and [redacted].  
20 Q. Do you know why he picked you as a person to  
21 contact?  
22 A. My understanding was that he called a friend  
23 of mine who is also a therapist, and she couldn't take  
24 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 [redacted] was first sexually  
11 abused -- is that what you're asking me?  
12 Q. Uh-huh.  
13 A. Was 11.  
14 Q. Eleven? The lawsuit says -- uses the word  
15 "incident," which seems to indicate it's only one  
16 time. Is it one time or is it multiple times?  
17 A. Multiple times.  
18 Q. Is it constrained just to Tennessee?  
19 A. No.  
20 Q. What other states?  
21 A. I'm not sure what other states there are, but  
22 I think some of the incidents occurred outside of the  
23 state of Tennessee.  
24 Q. Did [redacted] go over that or give you any  
25 information on those states, where it was?

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, [redacted] was 18 years old. And because [redacted] was  
9 18 years old, I actually didn't have to report it, but  
10 I did call DCS, and I said, "I have a child who was  
11 sexually abused as a minor, now [redacted] 18; what do I  
12 do?" And they said that they do not handle cases  
13 after a child turns 18.  
14 Q. So what happens to the child molester?  
15 MR. CRAIN: Objection; calls for legal  
16 conclusion.  
17 You may answer, if you know.  
18 THE WITNESS: It would be up to the  
19 person who was sexually assaulted to bring charges.  
20 BY MR. DAVIS:  
21 Q. I mean, I'm not in this world, in this realm  
22 at all. I'm not trained; I'm not a professional.  
23 You're obviously a professional now trained in the  
24 medical world. I'm just an average person.  
25 Is child -- and there are privileges that are

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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 [redacted] 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 [redacted] go over what it was that was done to  
 24 [redacted]?  
 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; [redacted] 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 [redacted]. 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 [redacted] almost being

Page 29

1 catastrophic when you met [redacted]. 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 [redacted] in April of 2008 when you  
 5 started talking to [redacted]?  
 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 [redacted] 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 [redacted] --  
 21 this vulnerability and rawness that [redacted] had been  
 22 sexually abused laid open for everybody to see, but  
 23 the family also basically implodes. And then, you  
 24 know, there's issues with the church and all of that  
 25 kind of stuff. So [redacted] severe stressors were coded on

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1 Axis IV as severe psychosocial stressors.  
 2 Q. You said [redacted] and [redacted] came to the first  
 3 visit. Did you counsel [redacted] and [redacted], or do you  
 4 counsel just [redacted] or --  
 5 A. Counseled them both together.  
 6 Q. Did you ever counsel [redacted] and John Perry?  
 7 A. Yes.  
 8 Q. So [redacted] 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 Charles Perry?  
 20 A. I was not an individual therapist for Charles.  
 21 Charles 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 [redacted] and counseled [redacted], 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 [redacted] 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 [redacted] 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 bad hearing so when you mentioned that

14 the police had contacted you, who was the police

15 officer again?

16 A. Chuck Fleming.

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

18 October of 2012?

19 A. Yes, sir.

20 Q. During the injunction hearing, you said that

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

22 summer of 2013?

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

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

25 [REDACTED]? 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.

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

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

3 A. I never talked to Wart.

4 Q. Did you ever talk to Jay Hager?

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

6 talked to Jay Hager about this case.

7 Q. Are you friends with Jay Hager?

8 A. I'm not.

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

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

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

12 from various pastors at the church.

13 Q. Did you talk to Jack Foster?

14 A. About this case?

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

16 know?

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

18 would send me referrals as they would come in.

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

20 people?

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

22 Q. Have they sent you any child sex abuse

23 clients?

24 A. Just this one.

25 Q. Did you ever talk to Sam Moore?

Page 37

1 A. No.

2 Q. Ever talked to anybody from the Billy Graham

3 Evangelical Association?

4 A. No, sir.

5 Q. The Covenant School?

6 A. No.

7 Q. Dr. Bill Campbell?

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

9 Q. Chip Campbell?

10 A. I don't know hir 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 [REDACTED]?

25 A. That right there. That exhibit right there

Ex 7



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1 that you have.

2 Q. I don't have -- oh, this exhibit?

3 A. Yeah. That was me testifying about [REDACTED], and

4 it has [REDACTED] name on it. My understanding is that

5 you're the one that posted that.

6 Q. It's got somebody blacked out here. I don't

7 know what it says.

8 MR. DAVIS: I think I've had enough.

9 MR. CRAIN: All right. I have no further

10 questions, and that will conclude the deposition.

11 THE VIDEOGRAPHER: Thank you. The time

12 is 2:00 p.m. We're off the record.

13 (Whereupon, the deposition

14 concluded at 2:00 p.m.)

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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

## New child abuse scandal hits Mike Huckabee: Republican White House hopeful's co-author molested [REDACTED], 11, and escaped charges because of statute of limitations

- John Perry co-authored Huckabee's 2008 campaign memoirs and is now revealed to have molested [REDACTED] between ages of 11 and 14
- Police concluded abuse had taken place but they were alerted to it after statute of limitations had kicked in
- Perry tells Daily Mail Online 'the parties involved were reconciled and restored years ago' and abuse emerged because of vendetta
- No suggestion Huckabee knew Perry was an abuser but comes after Duggar family revealed to have covered up son Josh's molestation of sisters

By [FRANCESCA CHAMBERS, WHITE HOUSE CORRESPONDENT FOR DAILYMAIL.COM](#)

PUBLISHED: 13:30 EST, 11 June 2015 | UPDATED: 14:25 EST, 11 June 2015

Republican presidential candidate Mike Huckabee is facing fresh controversy over links to a child abuser today.

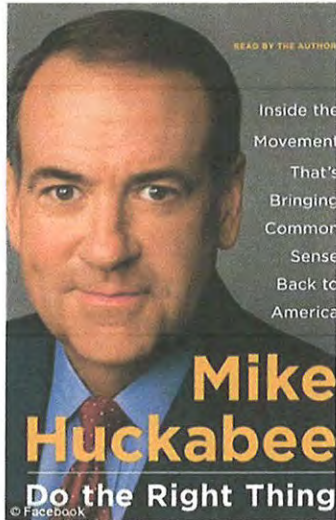
The evangelical Christian politician's co-author was revealed to have been found by police to have molested a [REDACTED] when [REDACTED] was just 11, and continued the abuse for three years.

John Perry, a prolific author who helped co-write hit movie *The Vow*, was not prosecuted because the statute of limitations had passed by the time police became involved, [Buzzfeed News](#) reported as it revealed the abuse.

Perry is the second associate of Huckabee to have been revealed as an abuser, after Josh Duggar's abuse of his sisters was disclosed.

Perry today told Daily Mail Online that 'the parties involved were reconciled and restored years ago' and that the investigation had been prompted by an individual who had a 'vendetta' against his former church.

Documents uncovered by BuzzFeed News show that Nashville, Tennessee, police investigated Perry in 2012. There is no suggestion Huckabee knew anything of the investigation into his co-author.



- **Prolific author: John Perry, 62, was the author of Huckabee's campaign memoir Do The Right Thing, published in 2009, as well as books under his own name**



- **Close link: Josh Duggar, who has been revealed to have molested his sisters, is part of the family which had been one of Mike Huckabee's most prominent supporters**

## 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.

Perry had earlier co-authored Huckabee's memoir about his failed 2008 bid for the GOP nomination.

Perry reportedly copped to the abuse and was subsequently excommunicated from his church. His wife also left him, citing 'inappropriate marital conduct' in the divorce proceedings.

Huckabee, a 2016 nominee for the GOP nomination, was already weathering the storm brought on by another child abuse scandal tied to his presidential campaign before BuzzFeed ripped the lid off of court documents implicating his two-time co-author Perry.

An evangelical conservative campaigning to win the votes of Christians nationwide, Huckabee has defended the Duggar family, of 19 Kids and Counting fame after it was revealed that their son Josh, a high-profile conservative activist, had molested several girls in his youth - two of whom were his sisters.

Josh Duggar underwent counseling for his offenses and was never charged in court.

'No one needs to defend Josh's actions as a teenager,' Huckabee said of his actions on Facebook last month, adding, 'but the fact that he confessed his sins to those he harmed, sought help and has gone forward

to live a responsible life as an adult is testament to his authenticity and humility.'

Based on the timeline laid out by BuzzFeed, Perry's misdeeds did not come to legal authorities' attention until 2012, though his church became aware of the alleged abuse sometime between 2008 and 2010. It is unclear exactly when they took place.

Perry told Daily Mail Online: '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.'

His books with Huckabee were released in 2007, *Character Is the Issue*, and late 2009, *Do the Right Thing: Inside the Movement That's Bringing Common Sense Back to America*.

Other works Perry takes credit for helping write include *The Vow*, the true story of Kim and Krickitt Carpenter. Written in 2000, it became a major motion picture starring Rachel McAdams and Channing Tatum in 2012.

His specialty is helping co-write autobiographical memoirs, though, and he's published a handful of non-fiction books under his own name.

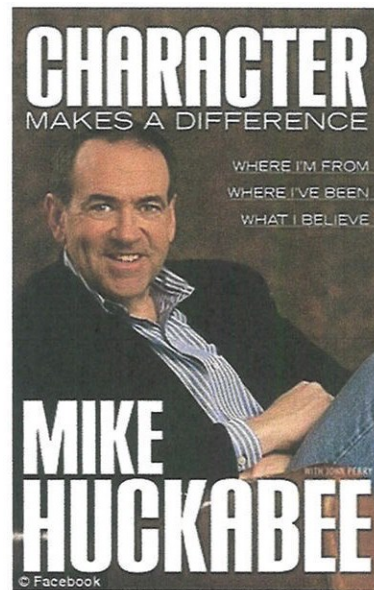
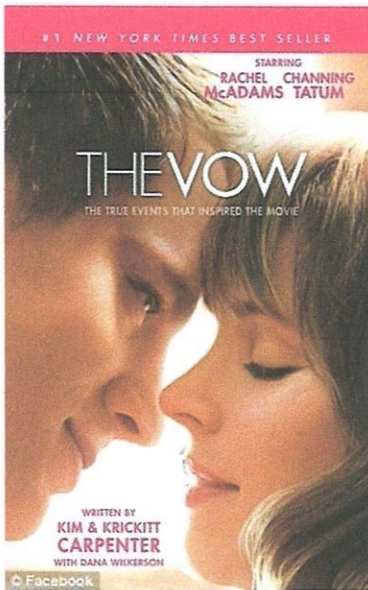
In 2010 he co-authored the novel *Letters to God*, based off the feature film. According to Perry's [Amazon](#) page, it debuted at #7 on The New York Times Best Seller List.

'In more than thirty published books, New York Times bestselling author, collaborator, and ghostwriter John Perry has achieved success writing biography, autobiography, true-life memoirs, and fiction,' his [website](#) states.

'Clients of every age and walk of life have put their trust in him, from governors and college presidents to beauty queens and ordinary people with extraordinary stories of triumph.'

Perry's accuser is not named in the BuzzFeed article. But it states that [REDACTED] began speaking out in 2007, when [REDACTED] was at least 18 or older, according to one of the court documents it obtained.

Catherine Davis, a parishioner at Perry's former church, Covenant Presbyterian Church, said in the court document that the alleged victim told her that [REDACTED] began telling [REDACTED] family members, church leaders, school officials and other people in [REDACTED] life about the abuse that year, though [REDACTED] did not share [REDACTED] story with Davis until the summer of 2012.



Other titles: John Perry was behind The Vow, as a co-writer, and co-wrote Mike Huckabee's 2007 political book, Character Makes A Difference



- **Two molester links and counting: Mike Huckabee with Jim Bob and Michelle Duggar, who had been high-profile supporters of his campaign until their son's incestuous abuse was revealed**

Minutes of meetings from Covenant Presbyterian Church - part of the national Presbyterian church - given to BuzzFeed by a parishioner show that Perry resigned from its deaconate in 2008.

At a separate meeting in 2010, Perry was reportedly excommunicated after 'he confessed to committing heinous and repetitive sin [...] and has not shown evidence of repentance'.

Those same minutes were used as evidence in a 2012 lawsuit brought against the church by Mrs. Davis and her husband Austin Davis, who are no longer parishioners there.

The Nashville Police department told BuzzFeed, 'The alleged sexual battery was reported to have occurred when the victim was between the ages of 11 and 14.'

As a result of its 2012 investigation, 'the allegations of sexual battery were sustained, but it was determined that the statute of limitations had tolled, barring prosecution,' spokesman Don Aaron told BuzzFeed.

'The victim was age 18 when [REDACTED] first disclosed the allegations to non-law enforcement and said at that time [REDACTED] did not want the matter reported to the Tennessee Department of Children's Services or the police.'

Perry's divorce proceedings are not a matter of public record. But BuzzFeed reports that, according to documents filed, Perry's ex-wife claims he 'admitted sexual abuse' of [REDACTED].

His response to her claim, based on the documents, was that 'there was never any testimony or other evidence of any kind presented' nor were there 'any orders or findings of fact [...] regarding any alleged sexual abuse of any minor child [REDACTED] to the parties' divorce or any other legal proceeding.'

Mr Davis, the ex-parishioner, claimed in his lawsuit that the church tried to cover up the scandal and harassed him for trying to bring it to light.

Covenant Presbyterian directed BuzzFeed to its lawyer.

The alleged victim of Perry's unwanted sexual advances reportedly told BuzzFeed that [REDACTED] doesn't share that view of how events unfolded. [REDACTED] believes that the church acted appropriately and does not believe it tried to cover up the abuse.

Buzzfeed states that Perry did not return multiple requests for comment before it published its article and that Huckabee's presidential campaign declined to comment for its story.

The campaign has not provided a comment to Daily Mail Online today.



**From:** Andrew Kaczynski <andrew.kaczynski@buzzfeed.com>  
**To:** valglenn18 <valglenn18@aol.com>  
**Subject:** Re: Follow-Up  
**Date:** Thu, Jun 11, 2015 8:32 am

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I don't think the police are participating in any cover up here. It's my understanding that once you reported it they investigated it. I'm going to have some meetings here to see how we can follow up. I do believe there's possibly some level of impropriety here from the church. Do you have reason to believe there are more victims here?

On Wed, Jun 10, 2015 at 11:27 PM, <valglenn18@aol.com> wrote:

> Andrew, you and Ilan and anyone else who helped you did a very professional  
> job of reporting on a very complex cover-up. It is no surprise to me that  
> Metro Police and ██████ are sticking to the story that the church and metro  
> police acted appropriately. Best, Austin

>

>

> -----Original Message-----

> **From:** Andrew Kaczynski <andrew.kaczynski@buzzfeed.com>

> **To:** valglenn18 <valglenn18@aol.com>

> **Sent:** Wed, Jun 10, 2015 9:31 pm

> **Subject:** Re: Follow-Up

>

> The story is online

> Austin:

> [http://www.buzzfeed.com/andrewkaczynski/co-author-of-mike-huckabee-books-was-accused-of-child-molest?utm\\_term=.ia4XmbWNm#.nmPBnAeMn](http://www.buzzfeed.com/andrewkaczynski/co-author-of-mike-huckabee-books-was-accused-of-child-molest?utm_term=.ia4XmbWNm#.nmPBnAeMn)

>

> On

> Wed, Jun 10, 2015 at 8:31 PM, Andrew Kaczynski

> <andrew.kaczynski@buzzfeed.com>

> wrote:

>> Looks private to me. The story is coming very soon.

>>

>> On Wed, Jun

> 10, 2015 at 7:48 PM, <valglenn18@aol.com> wrote:

>>>

>>> I think my keep and

> share file is now private. I tested access to the

>>> links from Wade's blog

> story and could not access the documents. I also

>>> tested the links from a

> few emails and also could not access the documents.

>>> If you can access

> anything, please let me know. Also, please let me know

>>> when the story.

> Thanks, Austin

>>>

>>>

>>> -----Original Message-----

**From:** ben@buzzfeed.com,  
**To:** fmdshiloh@aol.com,  
**Subject:** Re: BuzzFeed Story Correction - Mann Act Child Sex Abuse Cover-Up  
**Date:** Wed, Jun 12, 2019 5:24 pm

---

Hey Austin,

I believe what you're saying here. I just am not sure it's a story for us at this point.  
If helpful, I'd be happy to think about the right way to find a reporter -- maybe someone local? -- focused on this.

Ben

On Fri, Jun 7, 2019 at 12:41 PM Ben Smith <ben@buzzfeed.com> wrote:  
Hi Austin,

I'm moving our friends here to bcc. Can you send me a link to the story?

Ben

---

Ben Smith  
@buzzfeedben  
Signal/cell: 646 369 3687

**From:** fmdshiloh@aol.com,  
**To:** ben@buzzfeed.com,  
**Cc:** martin.baron@washpost.com, maggie.haberman@nytimes.com, Andrew.w.Kaczynski@gmail.com,  
**Subject:** BuzzFeed Story Correction - Mann Act Child Sex Abuse Cover-Up  
**Date:** Fri, Jun 7, 2019 11:35 am

---

Dear Mr. Smith:

I hope BuzzFeed will follow-up to correct a story written about my family in June 2015?

Nashville Police lied to BuzzFeed reporters that the "*statue of limitations was tolled, barring prosecution*" in a child sex abuse cover-up case. BuzzFeed has not followed up or made a correction to a story with a significant untrue police statement.

I was arrested after the BuzzFeed story was published, jailed for 18 days, lost a \$2.1 million defamation lawsuit via a contested default judgment, and was back before the Middle Tennessee Appellate Court for oral arguments again yesterday.

I've been in a court battle with Jay Sekulow's long-time attorney friend, Larry Crain, but Mr. Crain did not come to court on Wednesday. Instead, a young lady lawyer appeared in his position who was apparently not listed as an attorney on the court docket. (*I have a tape recording of the hearing*).

The judges were provided new information about the Federal White-Slave Traffic Act, also known as the Mann Act, which **does not** have a statute of limitations for the sexual abuse of an 11 year old child taken across state lines.

Mr Crain also represented the child-molester, John Perry, in a 3-million lawsuit against Rev. Billy Graham's publisher, Harper Collins.

John Perry has co-authored manuscripts with Rev Franklin Graham, Gov Mike Huckabee, Roy Moore, Richard Land, Chuck Colson, and possibly Jay Sekulow's ACLJ organization.

Opposing attorneys informed the Court that a "*contempt*" order was in the works against me so I guess I will be put in jail again for speaking out and trying to protect children, including a 6th grade Brentwood Academy alleged rape victim, and his siblings, who live about 12 houses away from where John Perry lived, or possibly still lives.

Attorney Larry Crain has also filed a \$1.5 million lawsuit against the mother of the 6th grade Brentwood Academy alleged gang rape victim.

I appreciate BuzzFeed scratching the surface on an elaborate child-molester cover-up back in 2015.

I hope you will follow up to report the rest of the "*Mann Act*" cover-up story in 2019.

Thanks,  
Austin Davis  
615-999-8190

Ex. 9

**From:** valglenn18@aol.com,

**To:** alberto.gonzales@belmont.edu,

**Subject:** Fwd: Austin Davis - Follow-Up To C-Span Town Hall Meeting - SEC Super Tuesday

**Date:** Sun, Feb 28, 2016 7:33 pm

**Attachments:** Worrick Robinson - WSMV TV - Court Transcript.pdf (9718K)

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**Mr. Gonzales, I keyed in your email address wrong. Here is my 2nd attempt. I really enjoyed your opening remarks yesterday. Very inspiring hour. Many Thanks, Austin Davis**

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

**From:** valglenn18 <valglenn18@aol.com>

**To:** alex.thomas <alex.thomas@JohnKasich.com>

**Cc:** alberto.gonzalez <alberto.gonzalez@belmont.edu>

**Sent:** Sun, Feb 28, 2016 7:20 pm

**Subject:** Austin Davis - Follow-Up To C-Span Town Hall Meeting - SEC Super Tuesday

**Mr. Thomas - Mr. Gonzalez - Please confirm you received my email. Thanks, Austin Davis 615-260-1993**

Dear Gov. Kasich,

Here is Covenant Sr. Pastor, Jim Bachmann, speaking about the Cruz Campaign last Sunday:

<https://soundcloud.com/valglenn18/jimbachmannedcruz>

Here are a few snippets from audio recordings from a former Covenant Pastor confirming the use of bullet-proof vests; a female Covenant Member talking about John Perry writing her a letter to confess in the spring of 2008; and a Covenant Deacon saying the Deacons did know about anything been done with police and security in 2008, and also in 2012.

<https://soundcloud.com/valglenn18/jakewallace>

Here is Gov Haslam's legal counsel (Herbert Slatery - later AG) who spoke at Covenant after we filed 2 child-molestation concealment lawsuits, and after my wife begged and pleaded with Herbert Slatery not to lend the credibility of his high office to Covenant Leaders. <https://soundcloud.com/valglenn18/herbert-slatery-speech>

Here is a small piece of my 2-hour interview with Nashville Police-- my final interview with them-- after many interviews with OPA when they absolutely did nothing except continue to cover-up: <https://soundcloud.com/valglenn18/police-opa-interview-austin-davis>

**Question:** What grown-up, adult political leader in their right mind would actually go anywhere near Covenant Presbyterian Church when they used a Worrick Robinson secret armed assault unit and Nashville Police to silence and intimidate a family?

As voters go to polls in more new states without being informed about the cover-up using armed police in 2008, I am grateful for your kindness to me and my daughter yesterday during the town hall meeting, especially as the crowd interrupted me when I mentioned UT, and later Penn State.

Attached is a file that will provide you more information on the Tennessee Media Cover-Up about two sex-crimes: 1) The child-molestation cover-up which used police to conceal, John Perry, known child-molester who co-authored two books with Gov Mike Huckabee in 2007-2008; 2) The Vanderbilt Rape Mistrial.

Attorney Worrick Robinson, is at the epicenter of the **PERFECT STORM** of both of these cases, and Robinson is also a powerful member of the UT Alumni Board, which is also being sued in a new sexual assault Title IX Federal Lawsuit filed on Feb 8th.

BuzzFeed's Andrew Kaczynski barely scratched the surface on this story but he mysteriously did not report on Worrick Robinson, the use of Nashville police, or a 'safe house' where other children were placed, which made him a part of the concealment effort as far as I am concerned. <http://www.keepandshare.com/doc4/69682/2015-cc8a-june-11-buzzfeed-protected-those-who-concealed-a-child-molester?da=y>

Oklahoma child-sex abuse advocate, Wade Burlison, did report on the public statements made in the BuzzFeed article, including the deceptive statement made about the statute of limitations being **TOLLED**, barring prosecution, per the police.

Fact is, the statute of limitations is **TOLLED, EXTENDED**, and is **STILL RUNNING** on the known child-molester, John Perry, even while you were kind to listen to information provided to you yesterday during the C-Span town hall.

A few days ago, Gov Haslam endorsed Marco Rubio prior to your town hall meeting, but Todd Harris of the Rubio campaign has not responded to me as you did. Also, the Ted Cruz Campaign was informed of this issue via Tn State Chair Kevin Kookogey but apparently Covenant Presbyterian Church and the Cruz Campaign were in discussions to have a "Gala Affair" up at Covenant where I

EX 10

was handcuffed and arrested even after the Cruz Campaign was told about the child-molestation scandal.  
<https://www.youtube.com/watch?v=QhHKXVQqTJE>

As I watched your press conference after the town hall yesterday, you spoke of the need for an 'adult President - a grown up' as the Candidate for the GOP. My daughter poked me in the ribs about many of your comments: never quitting, Noah, walking alone as a leader even when no one supports you, being a grown-up adult, appealing to authority, all of which I have been relentless to pursue for more than 7 years in an effort to protect children from a known child molester while I am still identified as a potential security threat by the Nashville Police Department, and the Vanderbilt Rape Judge in his appointment of a special prosecutor to jail me.

On Thursday, I do expect to get jailed while thousands of people who receive my email updates will watch in shock and dismay. I seriously doubt that Mike Huckabee or Ted Cruz or Marco Rubio or anyone will come to the Courthouse to champion my 'freedom of speech' like they did for Kim Davis up in Kentucky. <http://www.keepandshare.com/doc4/57880/2015-dd2-sept-8-pca-michael-brezina-responds?da=y>

I hope you are the "adult - grown-up" my family has been praying for during our desperate search for help during the 7 and a half years. I do know what those victims felt like in **SPOTLIGHT**, only the Nashville story is called **GASLIGHT** since many in our community have hated and tormented the 'whistleblower's family' who tried to protect other children.

May God richly bless you on Tuesday,

Austin Davis

615-260-1993

<https://www.keepandshare.com/doc4/72697/2016-c2-feb-18-tn-supreme-court-free-pass-for-jim-bachmann>

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

(unorganized filed but may help a little) - <http://www.keepandshare.com/doc4/72652/2016-c1-feb-20-grand-ole-pedophile-party-only-gets-worse?da=y>

<http://www.keepandshare.com/doc4/54969/2015-cc3-may-7-amicus-curiae-appeal-to-tn-supreme-court-5-2-meg?da=y>

<http://www.keepandshare.com/doc4/54970/2015-cc4-may-8-tn-supreme-court-denies-amicus-curiae-request-1-0-meg?da=y>

<http://www.keepandshare.com/doc4/72924/2016-c4-feb-26-1998-ensworth-basketball-team-and-other-photos?da=y>

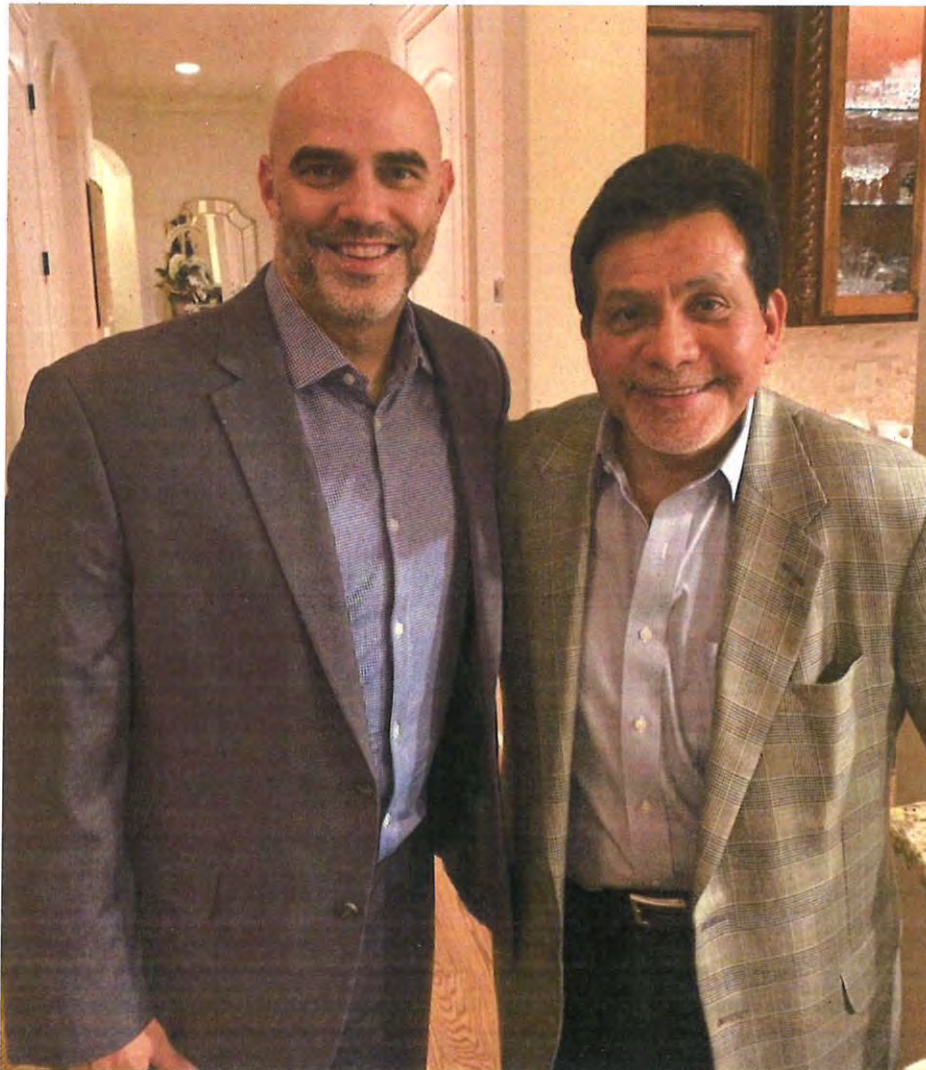


Joseph Fuson



Jun 22, 2019 · 🌐

Great evening last night with the Honorable Alberto Gonzales. Former Texas Secretary of State, Texas Supreme Court Justice, White House Counsel, and US Attorney General under President GW Bush. Very impressive guy. Thanks to my friend and cousin [Worrick Robinson](#) for the invitation, author Ken Abraham for the great stories, and Joe Hemphill for the hospitality.



👍 75

3 Comments



**From:** BZier@bass-

**To:** fmdshiloh@aol.com,

**Subject:** Re: MB - MBA Father Billy Lyell's Email Acct Messages

**Date:** Tue, Feb 9, 2021 9:08 am

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Stop sending me this trash.

Sent from my iPhone

On Feb 7, 2021, at 8:06 PM, [fmdshiloh@aol.com](mailto:fmdshiloh@aol.com) wrote:

See messages from the email acct of MBA Father Billy Lyell and court documents:

<https://www.keepandshare.com/doc15/23471/2021-1d-feb-4-rise-of-a-titan-billy-lyell-email-acct-court-docs?da=y>

The Silent Bell web site:

<https://www.thesilentbell.org/>

This email may contain privileged and confidential information and is meant only for the use of the specific intended addressee(s). Your receipt is not intended to waive any applicable privilege. If you have received this email in error, please delete it and immediately notify the sender by separate email.

**Do MBA – Harpeth Hall families support “private” child rape and child sex abuse, including the alleged gang rapes of a 6<sup>th</sup> grade Brentwood Academy student? Three midnight messages sent from the email account of MBA Father Billy Lyell seem to answer the simple question. See court documents and WKRN news report in this link.**

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

From: fmdshiloh@aol.com  
To: billy.lyell@redacted; redacted; redacted  
Sent: Sat, Jan 23, 2021 10:25 pm  
Subject: M27 - Brad Gioia - Resignations

<https://www.thesilentbell.org/>

Do MBA - Harpeth Hall families support "private" child rape and child sex abuse? A full review of The Silent Bell web site will explain why Brad Gioia, Roderick Russ, Mike Martin, Robert Sawyer, and Scottie Coombs should resign immediately. MBA related court transcripts about an on-going child sex abuse cover-up and the alleged gang rapes of a 6th grade Brentwood Academy student are included in revised web site link above. See page 18 of the "Ghislaina Maxwell - John Perry" document.

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

From: Billy.Lyell@redacted>  
To: fmdshiloh@aol.com <fmdshiloh@aol.com>  
Sent: Sat, Jan 23, 2021 11:55 pm  
Subject: Re: M27 - Brad Gioia - Resignations

Hey m\*\*\*\*\*f\*\*\*er, call me 615-300-redacted

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

From: Billy.Lyell@redacted>  
To: fmdshiloh@aol.com <fmdshiloh@aol.com>  
Sent: Sat, Jan 23, 2021 11:56 pm  
Subject: Re: M27 - Brad Gioia - Resignations

But I bet you are too big of a p\*\*\*y to call

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

From: Billy.Lyell@redacted  
To: fmdshiloh@aol.com <fmdshiloh@aol.com>  
Sent: Sun, Jan 24, 2021 12:00 am  
Subject: Re: M27 - Brad Gioia - Resignations

You are a low life and need your ass kicked