

FILED
AUG 27 2021
Clerk of the Appellate Courts
Rec'd By _____

**IN THE TENNESSEE SUPREME COURT
AT NASHVILLE**

Willie Austin Davis

Defendant/Appellant

vs.

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

State of Tennessee

Plaintiff/Appellee

RULE 11 APPLICATION OF APPELLANT WILLIE AUSTIN DAVIS

Willie Austin Davis
Citizen Appellant
P.O. Box 159153
Nashville, TN 37215
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In an abundance of caution, the identity of John Perry's Victim 1 is **REDACTED** in submission to Attorney Larry Crain's narrow injunction granted on 9/24/2018. Attorney Larry Crain represents child-molester John Perry, John Perry's Victim #1, and Gov. Bill Lee's Grace Chapel Church in Leipers Fork, Tennessee.

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III. TENN. R. APP. P. 11(b)(1) FILING STATEMENT

Pursuant to Tenn. R. App. P. 11(b)(1), the Appellant states that judgment in the Court of Criminal Appeals was entered on June 29, 2021. See Appendix (Opinion of the Court of Criminal Appeals). Appellant did not file a petition to rehear with the Court of Criminal Appeals. Accordingly, under Tenn. R. App. P. 11(b), Appellant's Rule 11 application was to be filed with the clerk of the Supreme Court by Aug 28, 2021. See *id.* ("The application for permission to appeal shall be filed with the clerk of the Supreme Court within 60 days after the entry of the judgment of the Court of Appeals or Court of Criminal Appeals if no timely petition for rehearing is filed, or, if a timely petition for rehearing is filed, within 60 days after the denial of the petition or entry of the judgment on rehearing."). Aug 28, 2021 being a Saturday, however, Appellant's application was due by Monday, Aug 30, 2021. See Tenn. R. App. P. 21(a). Thus, the Appellant's application has been timely filed. See *id.*

IV. TENN. R. APP. P. 11(b)(2) STATEMENT OF THE QUESTIONS PRESENTED FOR REVIEW

The Appellant presents one (1) question for the Court's review: 1. Did Judge Steve Dozier provide the Appellant a fair, impartial judiciary as affirmed by the Tennessee Court of Criminal Appeals?

STANDARD OF REVIEW

The Tennessee Court of Criminal Appeals utilized a "*plain error*" review to deny the Appellant's appeal. However, the Tennessee Supreme Court utilized a "*de novo*" review in ruling that a Tennessee judge should have recused himself from the "*Brice Cook vs. State of Tennessee*" case when Defendant did not file a motion for the judge to recuse. Appellant is not an attorney and petitions the High Court to exercise "*nostra sponte*" authority to administer substantial justice in reviewing whether Judge Steve Dozier defrauded the Appellant by not disclosing his "*friendship*" with Attorney Worrick Robinson, thereby denying the Appellant a "*fair day in court*" before a fair, impartial judiciary.

V. TENN. R. APP. P. 11(b)(3) STATEMENT OF THE FACTS RELEVANT TO THE QUESTIONS PRESENTED FOR REVIEW

On June 29, 2021, Judge Alan E. Glenn and the Tennessee Court of Criminal Appeals rendered an appellate court ruling against the Appellant to the great benefit of Davidson County Judge Steve Dozier and Attorney Worrick Robinson, a member of Covenant Presbyterian Church where the Appellant was falsely arrested. Judge Alan E. Glenn wrote in his judicial opinion: “The Defendant has failed to show any reason that the judge’s impartiality could reasonably be questioned... There is also nothing in the record to show that either the trial judge or the probation revocation judge was in any way influenced by, or even acquainted with, Mr. Robinson.” TR Vol 1 – Pg 1. Appendix – Pgs 5-6.

There is nothing in the record because Judge Steve Dozier defrauded the Appellant and intentionally concealed his “*friendship*” with Covenant Member Worrick Robinson during the 14-months Judge Dozier presided over the Appellant’s prejudiced pre-trial, trial, and sentencing proceedings prior to finally recusing himself from the Appellant’s case on Oct 23, 2017, while the Appellant was locked away in jail for 18 days.

Covenant Member Worrick Robinson’s undisclosed friendship with Judge Steve Dozier during the Appellant’s 14-month submission to Judge Steve Dozier is the number one factor in whether or not the Appellant received a fair, impartial judiciary as promised by the Tennessee Constitution, Article VI, Section 11: “No judge of the Supreme or Inferior Courts shall preside on any trial of any cause in the event or which he may be interested... except by consent of all parties.” See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 7 of “*3rd Correction-Modification*” Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, page 69 of 173, at the scanned filing.

Judge Steve Dozier defrauded the Appellant by intentionally not disclosing his “*friendship*” with Covenant Member Worrick Robinson, and per the United States Supreme Court decision in US v. Throckmorton [98 US 61(1878)], “*fraud vitiates everything*” in the procurement of a judgment by a Court, therefore the Appellant should be granted a New Trial.

In support of this Rule 11 application, Appellant now provides true statements of fact about the fraud perpetrated against the Appellant by Judge Steve Dozier to the great benefit of Judge Steve Dozier’s undisclosed friend, Covenant Member Worrick Robinson. Appellant makes request for the Tennessee Supreme Court, via the Rules of Appellate Procedure 14 (a), to consider post-judgment facts intentionally concealed by Judge Steve Dozier and his friend, Attorney Worrick Robinson, in pursuit of substantial justice: “The Supreme Court... on its motion or the motion of the party may consider facts concerning the action that occurred after judgment.”

Fact: Covenant Member Worrick Robinson played a major role in advising Covenant Leadership, and providing information to Nashville Police, ultimately resulting in the arrest of the Appellant at Covenant Presbyterian Church to protect the John Perry – Mann Act Federal crime cover-up which has no statute of limitations for child sex abuse across state lines. TR Vol 1 – Pg 111. Ex 5 cont – Motion for New Trial Hearing – 2 of 4 – Transcript of Trial – Vol 1 – Pg 37. TR Vol 1 – Pgs 80 – 85. See Exhibit 1 of “*Recusal Appeal*” motion submitted to the Tennessee Supreme Court on April 19, 2021, page 28 of 113, at the scanned filing.

Fact: Covenant Member Worrick Robinson was a friend, donor, supporter, and campaign fundraiser co-chair for “*Friends of Steve Dozier*” during the Davidson County judicial election of 2014. Judge Dozier defrauded the Appellant from receiving his “*fair day in court*” and did not disclose his “*friendship*” with Covenant Member Worrick Robinson as he presided over the

Appellant's case for approximately 14 months. Judge Dozier intentionally concealed his "friendship" with Covenant Member Worrick Robinson, and still has not disclosed his "friendship" five years later as of Aug 26, 2021. See Exhibit 3 of "Recusal Motion" filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 7 of "3rd Correction-Modification" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, page 69 of 173, at the scanned filing.

Fact: Covenant Member Worrick Robinson legally represented Covenant staff member, Mrs. Greg (Carolyn) Lurie, in a divorce case against former Covenant Member Greg Lurie prior to March 31, 2004. In March 2002, Greg Lurie's children were placed by child-molester John Perry and Covenant Presbyterian Church Leadership in John Perry's "safe house" for approximately 30 days without Greg Lurie's knowledge and consent. Greg Lurie stated in a sworn statement on Aug 8, 2014: "In the spring (March/April) 2002, my children were placed, by Covenant Presbyterian Church, in the house of John and Susan Ann Perry without my knowledge and against my wishes. Covenant Presbyterian Church referred to the Perry residence as a safe house and my children were placed there for approximately 30 days. Prior to my divorce on March 31, 2004, Worrick Robinson was an attorney for my wife. On March 4, 2007, I wrote and mailed a letter to John Perry to explain my feelings to him about the harm he had done to my family and children in 2002 when my children were placed in his house." TR Vol 1 - Pg 69-70.

Fact: Covenant Member Worrick Robinson also legally represented child molester John Perry's wife, Susan Ann Perry, in a divorce-alimony dispute which lasted from 2009 – 2012 before Judge Carol Soloman. Judge Carol Soloman defrauded the Appellant to demolish three of the Appellant's child sex abuse cover-up lawsuits without recusing, and refusing to recuse, even

though she was extremely knowledgeable about John Perry's child sex abuse. On March 13, 2009, Covenant Member Worrick Robinson filed a sworn divorce complaint on behalf of Mrs. John Perry (Susan Ann) which stated: "Wife fears for her safety and the safety of [REDACTED] unless Husband is restrained from molesting, harassing, threatening, or harming her and/or [REDACTED] due to Husband's past acts of abuse and molestation of [REDACTED]"

The sworn divorce complaint states that John and Susan Ann Perry separated on April 26, 2008, about two weeks before Greg Lurie was jailed by Judge Muriel Robinson for 80 days, and about two months before Attorney Worrick Robinson and Nashville Police threatened and silenced the Appellant from asking questions about the safety and welfare of young children harmed by child-molester John Perry. TR Vol 1 – Pgs 69-70, 93-94, 111-112.

Fact: Covenant Member Worrick Robinson legally represented the mother of children placed in John Perry's "safe house," and the wife of child-molester John Perry who hosted the "safe house." Appellant expressed his concerns about Covenant's care for small children placed in John Perry's "safe house" in a sworn declaration on Aug 10, 2014: "In my gut, I always knew that something was wrong even though everything had an orderly feel in the midst of the church oversight and I was fearful for the safety and welfare of children. I was later provided reports on "cutting" and one child being "catatonic" who would sleep on the floor and an older sister was asking daddy, what happened to my sister? As a result of my concerns and lack of "due process," I resigned from the Diaconate and later as a member as an act of peaceful dissent. I tried to be open to honest and healthy reconciliation with other people, but it is impossible to have healthy reconciliation with people who believe they are completely ordained by God, have a God-complex, and manipulate other people for their own selfish purposes. I wrote a resignation letter on July 27, 2006, in which I asked questions about the safety and

welfare of children. I also asked a question: “Would a molester or child abuser be a concern and reason to call such a meeting? This question was in reference to my request for a congregational meeting the Covenant Session denied.” Seventeen years later, Covenant Member Worrick Robinson is still protecting ex-Covenant Deacon John Perry’s “safe house” as the child sex abuse cover-up case now reaches the Tennessee Supreme Court for the 7th time. TR Vol 2 – Pg 170. . See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021. TR Vol 1 – Pg 107.

Fact: Covenant Member Worrick Robinson’s relative, Judge Muriel Robinson, sentenced former Covenant member, Greg Lurie, to 80 days in jail in mid-May 2008. Judge Muriel Robinson was a host committee member for Judge Steve Dozier’s campaign during the election of 2014. Greg Lurie stated in a sworn statement on Aug 8, 2014: “On or about mid-May 2008 until approximately mid-February 2009, I served 80 days in jail on consecutive weekends to complete my sentence imposed upon me by Judge Muriel Robinson, a relative of Worrick Robinson.” TR Vol 1 – Pg 69. See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021.

Fact: Covenant Member Worrick Robinson advised Covenant Clerk of Session, Scott Troxel, about an unauthorized “trespass” letter Scott Troxel mailed and couriered to the Appellant on June 27, 2008. The unauthorized letter was really a child sex abuse cover-up letter disguised as an official “trespass” letter, which was unauthorized by the Covenant Session per the May – July Covenant Board Minutes of 2008. Covenant Elder Scott Troxel testified about Covenant Member Worrick Robinson’s attorney consultation at the Appellant’s trial: “A. This was the measured response that was recommended by an attorney. And we had sent the letter to you letting you know about the trespass and-- . Q. Who was the attorney? A. There was

Worrick Robinson was one of the attorneys that was consulted.” Ex 5 cont – Motion for New Trial Hearing – 2 of 4 – Transcript of Trial – Vol 1 – Pg 37. TR Vol 1 – Pgs 80 – 85.

Fact: Covenant Member Worrick Robinson and a secret armed assault unit unlawfully blocked the Appellant, his wife, and his two minor children from entering a public Sunday worship service at Covenant Presbyterian Church on June 29, 2008, in violation of Article I, Section III of the Tennessee Constitution: “That all men have a natural and indefeasible right to worship Almighty God to the dictates of their own conscience... that no human authority can, in any case whatever, control or interfere with the rights of conscience.” The armed assault on the “*conscience and indefeasible right*” of the Appellant’s family to worship Almighty God was really a criminal child sex abuse cover-up crime disguised as an official “*trespass*” action, which was unauthorized by the Covenant Session per the May – July Covenant Board Minutes of 2008. Appellant’s wife, Catherine Davis, testified during the Appellant’s trial: “A. Okay. I didn’t see Scott Troxel, I don’t remember seeing him there at church. But when we walked up to the church, there were about seven really large men standing in front of the door and they seemed to be waiting for us and when we got up there they said we could not enter the church. Q. Do you remember who any of the men were? A. Well, I didn’t know any of the men, okay. I didn’t know who any of them were. I know that later I found out that Worrick Robinson was one of the men. And I found out the names of two of the other men, but I didn’t get to ask each one what their name was. But they were-- they were hired bodyguards and they had-- they were armed. And they were there to keep us out of the church.” Ex. 5 Cont. – Motion For New Trial Hearing – 3 of 4 – Transcript of Trial – Vol 1 - Pg 175. TR Vol 1 – Pgs 80 – 85.

Fact: Covenant Member Worrick Robinson spoke with Nashville Police Sgt. Twana Chick prior to Sgt. Twana Chick and Detective Tim Codling’s 2-hour nighttime investigation at

the Appellant's home on July 2, 2008. The nighttime police investigation at the Appellant's home was really a criminal child sex abuse cover-up action, not a "trespass-harassment-stalker" police action. Appellant was unable to obtain Sgt. Chick's police report for over a year until after the murder of Tennessee Titans Quarterback Steve McNair on July 4, 2009, and the MNPD CAD History reports did not identify Sgt. Chick and Detective Codling as being dispatched to the Appellant's private home. Sgt. Twana Chick investigated the safety of the Appellant's family and the mental health of the Appellant. Sgt. Chick also verbally threatened the Appellant: 1) Appellant would be immediately arrested if he ever stepped foot on the Covenant Presbyterian Church property for the rest of his life; 2) Appellant would be immediately arrested if he ever spoke with any member of Covenant Presbyterian Church for the rest of his life. Sgt. Twana Chick cited Covenant Member Worrick Robinson in her police report: "I spoke w/ Worrick Robinson, who witnessed the trespass. He said the subject was not belligerent, but was confrontational. He only felt concerned when he learned the subject asked the security officer if he had a gun. He gave me the names of the security officers: Juan Knight and Troy Stackhouse." (*Appellant is informed that other unnamed Nashville Police officers were involved in the Worrick Robinson secret assault units on June 29, 2008, and July 6, 2008.*) TR Vol 1 – Pgs 87-88. TR Vol 1 – Pg 111-112.

Fact: Covenant Member Worrick Robinson and his secret armed assault unit targeted and intimidated the Appellant's 13-year old daughter on July 6, 2008, after Covenant Youth Leader Betsie Carlson invited the Appellant's 13-year old daughter back to the Covenant property with the approval of Covenant Pastor Jim Bachmann. The targeting of the Appellant's 13-year old daughter was really a child sex abuse cover-up action, not a legitimate security action to protect Covenant members and the Covenant property from the Appellant's 13-year old

unarmed daughter. Appellant's 13-year old daughter testified during the trial: "A. Yes. I thought Drew and I were going to be taken away from you. Q. Was it confusing to you when the youth pastor contacted you and invited you back to church on the next Sunday? A. Yes. Q. Do you normally get invited to places where your parents can't come? A. No. And I was like 13, so that was weird. Q. So is it kind of normal if your 13 and someone invites you, would you think your parents would actually be? A. Well, they said – she said that Jim Bachmann said it was okay. Q. What happened when you went to church on that Sunday? A. They had, I guess some security team that Worrick Robinson was leading and they followed me to my Sunday school class and waited for me and then they just followed me around the church until I got picked up by my grandmother." TR Vol 2 – Pg 182-183. Ex 5 cont – Motion for New Trial Hearing – 3 of 5 – Transcript of Trial – Vol 2 - Pg 75.

Fact: Covenant Member Worrick Robinson and Metro Police Sgt. Twana Chick provided a security and mental health briefing about the Appellant to approximately 50 - 60 Covenant Leaders on July 14, 2008, after Nashville Police protected the John Perry child-sex abuse cover-up on July 2, 2008. Appellant was intentionally defamed and criminalized as a potential mentally ill "*security threat*" who might come shoot up the church, even though Covenant Leaders knew the Appellant had secret service clearance during the 2000 Presidential election and was not threat to anyone. Appellant was falsely criminalized while known child-molester John Perry was allowed to quietly resign and to remain among the "*Covenant family*" around other children without any disclosure to the "*Covenant family*," or a child sex abuse report being made to the Nashville Police, Sgt. Twana Chick, or DCS. The July 14, 2008 Covenant Board minutes stated: "Combined meeting with the Deacons was conducted. Officer Chick, Joe Eades, Jim Bachmann, and Worrick Robinson provided background concerning

Austin Davis. Mr. Robinson advised that the Session's response to the perceived security concerns did not have to be the strongest legal response available, but a reasonable response is necessary... M/S/P Accept John Perry's resignation from the Diaconate." TR Vol 1 – Pgs 84-85. TR Vol 1 – Pgs 111-112.

Fact: Covenant Clerk of Session, Scott Troxel, testified during Appellant's trial before Judge Steve Dozier that he and the Covenant Session members knew about John Perry's child sex abuse: "The Witness: Sure. John Perry was a former member, he was a deacon and he revealed to the Session that he--. The Court: He what I didn't understand what you said, revealed? The Witness: Well, no, no, no. Actually I don't think he revealed. I'm trying to recall how we found out, but basically we learned that he had molested [REDACTED]" Ex. 5 cont. – Motion For New Trial – 2 Of 4 – Transcript of Trial – Vol 1 - Pg 51.

Fact: During a pre-trial hearing on Sept 6, 2017, Judge Dozier made a prejudiced statement against the Appellant when he stated in open, public court that he did not care about who committed child sex abuse at Covenant Presbyterian Church: "I don't even know who you claim abused somebody and don't care." TE Vol 9 – Pg 11

Fact: Covenant Clerk of Session, Scott Troxel, testified that he and the Covenant Session members knew about John Perry's child sex abuse when John Perry's resignation from the Covenant Diaconate was accepted at the Covenant Session meeting on July 14, 2008. Covenant Member Worrick Robinson was a main leader and source of information for the Covenant Board meeting on July 14, 2008, and Scott Troxel testified that he and Covenant Leaders were advised by Covenant Member Worrick Robinson, or another unidentified attorney, that they did not have to report child-molester John Perry to law enforcement because the statute of limitations on John Perry's child sex abuse crimes had expired: "By Mr. Davis: Did you and the Session and your

lawyer, Worrick Robinson pick up the phone and call the Nashville Police and report a known child-molester back in 2008 before police were used on me? A. Basically, I don't recall exactly what we did or what we learned at the time. I know that everything we did was vetted by an attorney. I don't remember if it was Worrick Robinson or who at the time. But the statute of limitations or -- had run out is my understanding from what I recall on the offense and [REDACTED] chose not to press charges. And so there was not a burden on the Church's part, from what I recall, to contact the authorities on that. And he was immediately removed as a Deacon." To date, Attorney Worrick Robinson has not stepped forward to correct the false information that the statute of limitations on John Perry's child sex abuse has expired. There is no statute of limitations on John Perry's child sex abuse across state lines in violation of the Federal Mann Act. Exhibit 5 cont. – Motion For New Trial – 2 of 4 – Trial Transcript Vol 1 - Pg 53. TR Vol 1 – Pgs 84-85

Fact: Covenant Elder Scott Troxel testified against the Appellant and was asked at least three times by the Appellant, what are you guys hiding? Scott Troxel finally admitted that the Covenant Session knew about John Perry's child sex abuse when the Session accepted John Perry's resignation from the Covenant Diaconate during the same Covenant Session meeting when Covenant Member Worrick Robinson and Metro Police Sgt. Twana Chick provided a security briefing about the former Covenant Deacon-Appellant to a joint meeting of Covenant Elders and Deacons. The Appellant's wife, Catherine Davis, also testified about Scott Troxel and John Perry: "The Witness: Scott Troxel is hiding something, yes. By Mr. Davis: Q. What is he hiding? A. He's hiding the fact that they were very aware that they had a child molester, a confessed child molester in the myths (sic) that was the – the diaconate (sic), who was the officer of the church, very aware of when you wrote this letter they knew very well and they did

not want anyone to know that. And they kept him and never did a thing with him except for just keep letting him come to church. And they just created just sort of history to people -- no one else new but the elders don't think and whoever [REDACTED] told. But there had been other concerns about the family and that man with other families and that is what you are trying to express your concern about. The family's that have been put in his safe house. The children that had been put in there that came out damaged later. You were standing up for that family without knowing -- you just knew that something was wrong, the symptoms were there, but you didn't know about this -- that this man had confessed to the elder that he's molested [REDACTED]. And so-- it was [REDACTED] And so they knew about it and they wanted to keep it a secret. You are a man who is nobody (sic) for asking questions. You are a man who is known for being honest. And they did not want you-- and you are also a man known that possibly someone would come and tell you because you are someone who is approachable. Even though you were also an officer, but you were head of the mercy ministry. And so-- and they-- and I don't know why-- we did not know about it, but then they wrote this letter-- this man, one of the elders wrote a letter, but it is not based on what is traditionally known. The people in the church have to decide those things. They can't just run the church like they say this is what they do, they are just saying that. They are just assuming authority. But it's not people. I mean, they can take it if other people will let them have it. But it's not legal in the Presbyterian Church in America to do it that way. However, the main thing is that this guy confessed and they did nothing with him. What they did was they created some sort of thing like oh, let's keep Austin away because he's a threat to us. The only threat was that you would ask a question or that you want it had the truth. And that you weren't buying all the smoke and mirrors. And so anyway, so they let John Perry stay there. They let him quietly resign. The victim said that they made a deal with them, you resign, we

don't say anything, won't report you, won't do anything." 5 Exhibits cont – Motion For New Trial Hearing – 3 of 4 – Transcript of Trial Vol 1 – Pgs 196-198.

Fact: Covenant Member Worrick Robinson knew about John Perry's child sex abuse as early as 2008 per the sworn interrogatories of John Perry's child sex abuse Victim #1, [REDACTED] aka [REDACTED]. The interrogatories were obtained in a related John Perry child sex abuse cover-up case which has already been petitioned and denied by the Tennessee Supreme Court (Case # M2018-[REDACTED]-SC-R11-CV). Sworn Interrogatory No. 6 states: "Identify the date when Worrick Robinson was first informed about the child sex abuse of the Plaintiff? Response: Plaintiff does not know for sure when Worrick Robinson was first informed of the incidents of child sex abuse from the Plaintiff's childhood, but would state to the best of [REDACTED] knowledge, it was sometime in 2008." See Exhibit 2 of "1st Post-Judgment Motion" filed with Tennessee Court of Criminal Appeals on Sept 18, 2020, page 39 of 58 at the scanned filing.

Fact: John Perry's child sex abuse Victim #1, [REDACTED], aka [REDACTED], provided sworn interrogatory testimony about Covenant Youth Pastor J Hager and Mrs. Hager (Natalie), Teri Cavender, and Nashville Christian School. This sworn interrogatory testimony was obtained in a related John Perry child sex abuse cover-up case which has already been petitioned and denied by the Tennessee Supreme Court (Case # M2018-[REDACTED]-C-R11-CV): 1. Interrogatory No. 25 – Identify the date(s) when the Plaintiff first informed Jay and Natalie Hager about the Plaintiff's child-sex abuser. Response: 2007. 2. Interrogatory No 26 – Identify the date(s) when the Plaintiff first informed Teri Cavender about the Plaintiff's child-sex abuser. Response: July 2007. 3. Interrogatory No. 28 – Identify the date(s) when the Plaintiff first informed school authorities and/or teachers at Nashville Christian School about the child sex abuse of the Plaintiff. Response: July 2007. See Exhibit 2 of "1st Post-Judgment Motion" filed

with Tennessee Court of Criminal Appeals on Sept 18, 2020, pages 47-48 of 58, at the scanned filing.

Fact: Victim #1's child sex abuse therapist, Caroline Cone, in a related child sex abuse cover-up case which has already been petitioned and denied by the Tennessee Supreme Court (Case # M2018-██████-SC-R11-CV), testified that John Perry committed child sex abuse across state lines in violation of the Federal Mann Act: "Q. In the lawsuits, they've given the ages 11 and then they changed it; they went to 12. Do you know what the age was? A. I believe the age when ██████ was first sexually abused -- is that what you're asking me? Q. Uh-huh. A. Was 11. Q. Eleven? The lawsuit says-- uses the word "incident," which seems to indicate it's only one time. Is it one time or multiple times? A. Multiple times. Q. Is it constrained just to Tennessee? A. No. Q. What other states? A. I'm not sure what other states there are, but I think some of the incidents occurred outside of the state of Tennessee. Q. Did ██████ ever go over that or give you any information on those states, where it was? A. Yes, sir." See Exhibit 1 of "Recusal Appeal" motion submitted to the Tennessee Supreme Court on April 19, 2021, page 28 of 113, at the scanned filing.

Fact: John Perry's Victim #1 informed the Appellant of the child sex abuse in 2012, Appellant stated in a sworn declaration on Aug 10, 2014: "During the summer of 2012, I met with the known molestation victim at my home for several hours. The victim told me that ██████ had been molested by John Perry approximately 25-times in multiple states when ██████ was 11-13 years old. The victim told me that ██████ began to speak out to private counselors, family members, church members, school officials, and church leaders after ██████ turned 18 on July 11, 2007, while both of us were attending Covenant. The victim told me ██████ had lost weight down to 86 pounds and felt like ██████ was losing ██████ mind because no one believed ██████ story and ██████ almost jumped

off the bridge downtown because [REDACTED] was still living at home with the molester enduring unimaginable anguish and suffering.” TR Vol 2 – Pg 177.

Fact: Victim #1’s child sex abuse therapist, Caroline Cone, provided sworn testimony on March 14, 2016, that Covenant Pastor Larry Ferris knew about John Perry’s child sex abuse in April 2008, two months before Nashville Police threatened and silenced the Appellant on July 2, 2008. “Q. Ms. Cone, did you say you had learned about the child molestation in 2008? A. Yes.... Q. So when in 2008 did you first start counseling [REDACTED] A. April. Q. Or was it 2007, whenever it was? A. It was 2008, and it was April. Q. April. And so when the church calls you, do you know who it was in the church that called you. A. One of the pastors. Q. Do you remember who? A. I believe it was Pastor Ferris. Q. Pastor Larry Ferris. Pastor Larry Ferris called you in April 2008? A. Yes, sir.” See Exhibit 1 of “*Recusal Appeal*” motion submitted to the Tennessee Supreme Court on April 19, 2021, pages 45-46 of 113, at the scanned filing.

Fact: Victim #1’s child sex abuse therapist, Caroline Cone, provided sworn testimony about John Perry’s child sex abuse and John Perry’s “safe house” where other children were harmed: “(By Mr. Davis): Who is the molester? A. Who is the what? Q. The molester? Do you know who the molester was? A. Yes, sir. Who is it? A. John Perry... Did you know other children had been put in the molester’s house back in 2002? A. Other children had been been put -- . Q. Yes, the safe house, and there were other children, put back in his house, little girls, small kids. A. I did not know that. Q. Yes. That was done in 2002 -- . Mr. Crain: Objection, that’s testimony your honor. The Court: You’re testifying. You’re trying to -- . Mr. Davis. I’m not trying -- . The Court. You asked her a question: was she aware of a safe house back in 2002. Her answer was no. She was not aware. Then you said: Well, you know, it was this, this was going on. That’s not -- ask a question. Q. (By Mr. Davis) As a person that deals with

people who have been molested, is that a concern to you? A. That it was a safe house? Q. No, that John Perry had children that the church put in their house with him back at the same time when the victim was being molested. A. That would be a concern for me. Mr. Davis. Thank you.” See Exhibit 1 of “*Recusal Appeal*” motion submitted to the Tennessee Supreme Court on April 19, 2021, pages 52, 56-57, of 113, at the scanned filing.

Fact: Appellant provided a judicial letter to the Tennessee Court of Criminal Appeals sent by Judge Thomas Brothers to DA Glenn Funk which stated: “Please find enclosed DVD’s of the trial testimony in the recent case of [REDACTED] versus Austin Davis, 16C[REDACTED]. The Plaintiff testified under oath that [REDACTED] had been molested as a child by [REDACTED]. During the trial the Defendant made numerous complaints that the police and authorities have refused to investigate these claims. I believe it is my obligation to provide this information to your office in order that you may determine whether any further review or investigation is required.” See Exhibit 8 of “*3rd Correction-Modification*” Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, page 88 of 173 at the scanned filing.

Fact: Appellant provided a judicial order to the Tennessee Court of Criminal Appeals written by Judge Kelvin Jones which stated: “The plaintiff testified that [REDACTED] was a victim of child molestation perpetrated by John Perry.” See Exhibit 8 of “*3rd Correction-Modification*” Motion filed with the Tennessee Court of Criminal Appeals on June 29, 2020, page 90 of 173 at the scanned filing.

Fact: Child-molester John Perry was finally excommunicated on June 6, 2010, three years after Covenant Youth Pastor J Hager was informed by Victim #1 of John Perry’s child sex abuse in 2007, and two years after Attorney Worrick Robinson, a secret armed assault unit and Nashville Police had silenced the Appellant from asking questions about the safety and welfare

of numerous children placed in John Perry's "safe house." Covenant Elder John Avery read the ecclesiastical church court judgment to the congregation: "Whereas John Perry has confessed to committing heinous and repetitive sin against [REDACTED] and has not shown evidence of repentance, the Session of Covenant Presbyterian Church has declared that he is excluded from the sacraments and cut off from the fellowship of the church. The Session has taken this action with sorrow and the desire to see him repent and return to Christ and the fellowship of His Church. If you have questions, feel free to ask the pastors or other Session members. TR Vol 2 – Pgs 188-189.

Fact: About two months after unrepentant child-molester John Perry was excommunicated from Covenant Presbyterian Church and released unreported into the Nashville Community, Covenant Member Worrick Robinson chased down the Appellant's wife and mother-in-law in the parking lot at Covenant Presbyterian Church. Appellant's wife, Catherine Davis, wrote Covenant Elder Herb Kneeland an email about Covenant Member Worrick Robinson on Aug 27, 2010: "Dear Herb: two Sunday's ago a police car was parked in front of the sanctuary. Last Sunday Worrick Robinson chased after me and my mother when we were walking towards the parking lot. Worrick gave me a piece of paper which I subsequently threw to the ground unread. My mother told Worrick that she was afraid of him and to please go away. Yes, I am afraid of what your lawyer will do to us. I've already had those German boots at my doorstep before. It's a frightening, sickening, and shameful experience when the Gestapo comes to your home... You will have to call out the German Sheppard and the fire hoses to stop me from being in God's House." TR Vol 2 – Pgs 196-197.

Fact: About a year after child-molester John Perry was excommunicated from Covenant Presbyterian Church on June 6, 2010, Covenant Member Worrick Robinson intimidated the

Appellant's daughter on the campus of The Harpeth Hall School. On Aug 29, 2011, Appellant provided information about Covenant Member Worrick Robinson to the Harpeth Hall Upper School Dean, Jess Hill, who is now promoted to the Head of The Harpeth Hall School: "Dear Jess: Catherine picked up Daisy's transcript for this year. We have not heard from Anne King of the business office but I would like a refund on the tuition paid and a written release from the contract for this year... Daisy does not like to verbally express her feelings about some of the fears she has experienced but yesterday she recount in great detail the fear she felt the first time that Worrick Robinson appeared at Harpeth Hall and how she escaped to a safe place to call me on the phone so I could come to school (which her mother and I did). I don't know if Worrick Robinson (non-Harpeth Hall parent) meant anything ill towards Daisy during the time he appeared on campus but my 13-year old daughter was surrounded by him and his large secret bodyguard unit on two separate occasions as a minor and also when he and Jim Bachmann stood near her on many occasions at high school football games. She also was fearful of Mr. Robinson because his name appeared on a police report documenting the invasion of our private residence by Metro Detectives-- without just cause-- and Daisy was very aware that the Metro Detectives were investigating the safety of the children in our home and had threatened to arrest me and put me in jail. Worrick Robinson, Jim Bachmann, Dr. Lee Bryant, and Ray West (and many others) are all very good friends. Dr. Lee Bryant (with two other leaders) actually blocked my wife and mother-in-law from walking into a public worship service last summer (with Daisy) after an apology was requested on Daisy's behalf from Pastor Jim Bachmann by my wife and mother-in-law. The inspiration for Daisy desiring the apology and returning to Covenant to battle against vicious peer lies aimed in her direction came from Daisy's study of To Kill A Mockingbird in

Mr. Ross's class: "The girls and boys will never be my friends unless they first learn how to RESPECT me." TR Vol 1 - Pg 120.

Fact: Judge Steve Dozier also revealed prejudice against the Appellant when he extended intimidation and a threat to the Appellant's daughter in a pre-trial hearing when the Appellant's daughter was not even present in the courtroom, or a party to the hearing: " The Court: Can you tell her not to be texting or emailing the Asst DA. Mr. Davis: Well, I mean is that something I'm supposed to do? It's a free country. The Court: I'm just asking you. Otherwise she might charge your daughter with harassment or something. Just convey that to your daughter, can you do that? Mr. Davis: Okay. I will say that there is a child-molestation cover-up and people have been speaking out about what's going on." The Court: Okay. If you don't care about your daughter, then she may charge her. Mr. Davis: I do care about my daughter. The Court: All right. Then just relay hey a court downtown asked you to quit text or emailing the DA, that's all I am asking. Can you do that? Mr. Davis: Yeah. I can do that. I feel like that violates her First Amendment rights, but I will do that. The Court: Okay. Well then sue me. Get her to sue me. All right. You can step back." TE Vol 6 – Pgs 7-8.

Fact: Attorney Worrick Robinson was a number one concern identified to the attention of Judge Steve Dozier by the Appellant during at least two pre-trial hearings. On March 10, 2017, Appellant informed Judge Steve Dozier that disgraced ex-Judge Casey Moreland should have recused from the Appellant's case because of ex-Judge Moreland's friendship with Attorney Worrick Robinson: "I've been bound over to a grand jury and indicted by a judge that should have recused himself in a case because Worrick Robinson was at the heart of the reason I was arrested. And he's representing Judge Moreland in front of a board of review. And I don't think that judges ought to be putting people up in front of grand juries and indicting them."

Judge Steve Dozier defrauded the Appellant and intentionally chose not to reveal his friendship with Covenant Member Worrick Robinson, or that Worrick Robinson had been a “*Friends of Steve Dozier*” campaign fundraiser co-chair in 2014. TE Vol 7 – Pg 10. See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021.

Fact: On March 31, 2017, Appellant informed Judge Steve Dozier about his number one concern with ex-Judge Casey Moreland not recusing from his case because of his relationship with Attorney Worrick Robinson. Appellant filed a written reply to a government motion for the Court to rule on the Defendant’s use of a personal recording device during court hearings. Appellant stated in his written reply: “During this time when an FBI investigation is still on-going, it does not make sense that the DA’s Office would not want others to know that Judge Casey Moreland did not recuse himself from the Defendant’s legal case since Attorney Worrick Robinson is a long-time friend of Judge Casey Moreland, and Worrick Robinson was also an attorney in the Vanderbilt Rape Trial when the Defendant was secretly banned from the public criminal trial without the public or average citizen in the courtroom being informed about the secret banning, and Worrick Robinson was also involved in the aggressive and hostile harassment of the Defendant and the Defendant’s family at Covenant Presbyterian Church during a child-molester concealment effort which utilized the Nashville Police Department and is still on-going in Tennessee Courts to the great benefit of child-molester. John Perry, co-author with GOP Presidential Candidate Mike Huckabee in 2007-2008.” TR VOL 1 – Pg 34.

Fact: Attorney Worrick Robinson misused the 1st Vanderbilt Rape Trial to further defame and criminalize the Appellant during the Appellant’s civil lawsuit filed against Attorney Worrick Robinson on June 19, 2013, four days prior to the Vanderbilt Rape assault which occurred on June 23, 2013. On June 8, 2016, about one year after the 1st Vanderbilt Rape Trial

was declared a mistrial, Attorney Worrick Robinson's powerful influence did reach the public courtroom of Judge Cheryl Blackburn, in contrast to the written appellate opinion of Judge Alan E. Glenn, which stated: "There is also nothing in the record to show that either the trial judge or the probation revocation judge was in any way influenced by, or even acquainted with, Mr. Robinson." Appendix – Page 5.

Fact: The influence of Attorney Worrick Robinson did reach the courtroom of Judge Cheryl Blackburn, and Judge Cheryl Blackburn was acquainted with Worrick Robinson based upon a Nov 6, 2017 court transcript provided to the Tennessee Court of Criminal Appeals: "The Court: Okay. All right. Well, I see Mr. Robinson is here. I didn't know, did you want him to leave the courtroom. General Harris: I don't intend on calling him. Mr. King: Mr. Robinson is always welcome in the courtroom." TE Vol 11 - Pg 8.

Fact: Judge Cheryl Blackburn, who replaced Judge Steve Dozier after he recused post-sentencing while the Appellant was locked away in jail, also refused to recuse from the Appellant's case disregarding the Appellant's concerns expressed in the Appellant's New Trial Motion written by hand during the Appellant's 18-days in jail: "11. On Oct, 20, 2017, the Defendant's family and a friend were planning to attend the MBA Spaghetti supper and the Brentwood Academy football game when the Defendant returned home from walking his dog to be arrested in his wife's apartment following Judge Cheryl Blackburn's signed order to arrest for probation violation. The Defendant was prosecuted by Special Prosecutor Ben Russ in a 7th post-trial hearing following the Defendant's secret banning from the 1st Vanderbilt Rape Trial which also involved Covenant Member Worrick Robinson. The secret banning of the Defendant during a televised, public trial was also excessive and a violation of constitutional rights since

trials are open to the public. (Judge Blackburn should recuse if she is assigned as new judge).”

TR Vol 3 – Pgs 316-318. TR Vol 3 - Pg 322.

Fact: Judge Cheryl Blackburn convicted the Appellant of “*contempt of court*” in a Vanderbilt Rape Special Prosecution bench trial based upon untrue information Attorney Worrick Robinson provided to Judge Monte Watkins, but Judge Cheryl Blackburn did not recuse from the Appellant’s case and she denied the Appellant’s New Trial Motion on Sept 17, 2019. Contrary to the appellate opinion of Montgomery Bell Academy Alumnus, Judge Alan E. Glenn, who also refused to recused from the Appellant’s case, Judge Cheryl Blackburn was influenced by Covenant Member Worrick Robinson’s untrue defamation that the Appellant was a potential “*security*” threat to the community. The Vanderbilt Rape Trial was televised and the Appellant did not disrupt the proceedings or threaten Attorney Worrick Robinson or any other attorney or court officer involved in the case, but Judge Blackburn cited untrue information in her final “*contempt of court*” order against the Appellant: “This matter came before the Court for a bench trial on a show cause order issued by Division V of the Criminal Court. This Court heard proof on June 8, 2016, where the State presented the testimony of Tamika Clark and a You Tube recording Austin Davis published on the internet... Austin Davis attended a public trial in case no. 2013-C-2199, pending in Division V of the Criminal Court. Pursuant to an order issued by Judge Monte Watkins, presiding Judge of Division V, on Oct 9, 2015, Mr. Davis “was disruptive to the court proceedings by threatening an attorney and engaging in offensive conduct with a court officer as well as a court secretary. (Tennessee v. Austin Davis, No. 4877 (Oct 9, 2015)), The Court, therefore, banned Mr. Davis from attending the trial “*for the safety of all and the best interest of justice.*” See Exhibit 2 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021, pages 12-13. TR Vol 3 - Pgs 383-384.

Fact: Attorney Worrick Robinson was identified by Tameka Clark, judicial administrative assistant for Judge Monte Watkins, as the Vanderbilt Rape attorney providing information against the Appellant to Judge Monte Watkins: “Q... How and when did it come to your attention that these things happened? A. An attorney, Worrick Robinson, would forward them to me and would let us know. Once-- because the first one was when I was recorded, and they-- they forwarded it to me. That’s how it all came after that. Q. So it was sort of an on-going basis Mr. Robinson would --. A. Yes. Q. -- supply the chambers of Judge Watkins with information about what he considered to be the contemptuous behavior on Mr. Davis’ part? A. Yes. Q. Okay. And did you either because you wanted to or because it’s part of your duties follow up on that information Mr. Robinson supplied? A. Yes. Once I would receive them I would open the e-mail. Sometimes they would be written emails, other times they would just be audio recordings.” See Exhibit 2 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 27, 2021, pages 12-13.

Fact: Judge Cheryl Blackburn convicted the Appellant of “*contempt of court*” for violating Judge Monte Watkins order for the Appellant not to record a post-Vanderbilt Rape Trial hearing, but there was no proof provided to Judge Blackburn that the Appellant recorded the hearing, or that the Appellant instructed someone else to record the hearing. The Appellant did not record the hearing, did not instruct anyone to record the hearing, and did not have the burden of proving he did not record or instructed someone else to record, and Judge Blackburn’s prejudice against the Appellant is self-evident in the transcript of the Special Prosecution of the Appellant. See Exhibit 2 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 28, 2021.

Fact: Attorney Worrick Robinson received national and international media coverage during several Vanderbilt Rape trials, but Judge Steve Dozier defrauded the Appellant and did not disclose his “*friendship*” with Worrick Robinson during the 14-months he presided over the Appellant’s trial. Instead, Judge Steve Dozier kept his “*friendship*” with Worrick Robinson a courtroom secret, while Judge Dozier promised the Appellant there were no “*secrets*” in his courtroom: “There are no secrets in here.” Appellant informed Judge Steve Dozier that Covenant Member Worrick Robinson was one of the reasons that he was there as a criminal defendant: “Worrick is one of the reasons I am here.” However, Judge Steve Dozier defrauded the Appellant denying him a “*fair day in court*” and intentionally chose not to reveal his “*friendship*” with Worrick Robinson, or that Worrick Robinson had been a “*Friends of Steve Dozier*” campaign fundraiser co-chair in 2014. Exhibit 2. TE Vol 8 - Pg 4,8.

Fact: Judge Steve Dozier was prejudiced against the Appellant in favor of Worrick Robinson who was a major participant in the John Perry – Mann Act Federal crime cover-up at Covenant Presbyterian Church. Judge Dozier stated in a pre-trial hearing on Sept 6, 2017: “I don’t even know who you claim abused somebody and don’t care. But we are not going to be trying whether or not someone was sexually abused at Covenant Presbyterian Church. Mr. Davis: You don’t care about that?” TE Vol 9 – Pg 11

Fact: Judge Steve Dozier allowed Asst. DA Chandler Harris to continuously mock the Appellant’s child sex abuse allegations as “*myths, red herrings, and ideations*” even though Judge Steve Dozier heard sworn testimony from DA Star Prosecution Witness Scott Troxel that the child sex abuse allegations were true: “Q. Okay. And Mr. Davis talked about some of the **myths**. I believe that he believes the church is hiding from him or something... It is not a legal affirmative defense, nor is it any defense to this crime that Mr. Davis sought to go uncover this

massive conspiracy cover-up of this child-molestation going on. **It is a red herring...** The defendant has engaged in correspondence with several members of the MBA community that he believes are involved in his other **ideations** of child abuse at Covenant Presbyterian Church ” Exhibit 5 – Motion For New Trial Hearing – 2 of 4 – Transcript of Trial Vol 1 – Pg 78. Exhibit 5 – Motion For New Trial Hearing – 4 of 4 – Transcript of Trial Vol 2 – Pg 121 – TR Vol 3 – Pg 399.

Fact: On Sept 11, 2017, Appellant was transparent and honest to disclose to Judge Dozier and DA Glenn Funk’s Prosecution team at the beginning of jury selection that Appellant had family members at Brentwood Academy who possibly knew Judge Dozier’s children, but Judge Steve Dozier did not reciprocate with the same “*Rule 10*” ethical standard of transparency and honesty about Judge Dozier’s “*friendship*” with Covenant Member Worrick Robinson 5 Exhibits – Motion For New Trial Hearing – 1 of 4 – Transcript of Jury Selection - Pgs 12 – 14.

Fact: On Sept 11, 2017, Judge Steve Dozier promised the Appellant: “Nobody is going to mistreat you in here in any way from my perspective.” Ex. 5 Cont. – Motion For New Trial Hearing – 2 of 4. Transcript of Trial – Vol 1 – Pg 17.

Fact: During the jury selection process, Judge Steve Dozier repeatedly informed the jurors how important it was for them to be fair and impartial, and to tell the truth with their answers, but Judge Dozier himself chose to conceal his own personal friendship with Covenant Member Worrick Robinson, his campaign fundraiser co-chair for the “*Friends of Steve Dozier*” election effort in 2014. Exhibit 5 – Motion For New Trial – 1 of 4 – Transcript of Jury Selection – Pgs 16, 17, 20, 29.

Fact: Attorney Worrick Robinson was at the center of the vetting questions the Appellant asked the prospective jurors. Appellant asked former Fellowship Bible Church member, Elisa

Marie Thiele, if she was kin to any police, Attorney Worrick Robinson, or Judge Casey Moreland: “Mr. Davis: Do you have any police members in your family or are you kin or anything or to anyone or to Worrick Robinson or Judge Casey Moreland? Ms. Thiele: No.” Appellant asked Juror Elizabeth Ann Spano, and Juror Kurt Bartlett if either one of them was kin or familiar with Worrick Robinson? Juror Spano answered no and Attorney Kurt Bartlett answered that he was familiar with Worrick Robinson. Appellant believes that he asked all juror candidates about Attorney Worrick Robinson, ex-Judge Casey Moreland and the Nashville Police Department, but the unsigned, uncertified transcript of jury selection did not include such information and the Tennessee Court of Criminal Appeals denied three requests for the Appellant to be permitted access to the video recordings of the trial to verify the accuracy of the jury selection transcript which took approximately 21 months to obtain, with the Appellant paying twice for the jury selection transcript. 5 Exhibits – Motion For New Trial – 1 of 4 – Transcript of Jury Selection – Pgs 95, 97-98, 111-112.

Fact: Judge Steve Dozier did not reveal that Attorney Worrick Robinson’s relative, Judge Muriel Robinson, was a co-host committee member for the “*Friends of Steve Dozier*” campaign effort in 2014; or that juror # 1, former police officer and attorney Kurt Bartlett, was also a co-host for the “*Friends of Steve Dozier*” campaign effort in 2014; or that Judge Steve Dozier was a long-time friend of Stan Fossick, the Appellant’s grand jury foreman on both contaminated indictments of the Appellant, or that grand jury foreman, Stan Fossick, was the grand jury foreman on approximately 40% of the grand juries in Davidson County since 1993; or that Judge Steve Dozier probably knew dozens of Covenant Presbyterian Church members such as Attorney Worrick Robinson, and his Uncle Don Dozier, and his aunt Chris Dozier, but Judge Steve Dozier never disclosed a word about any of these potential “*conflicts of interest*” during

pre-trial hearings, during jury selection, during the trial, and during the sentencing hearing, until after the Appellant was arrested and jailed for exposing the secret "*conflicts of interest*" to the Montgomery Bell Academy (MBA) and Brentwood Academy (BA) communities prior to the MBA vs. BA football game on Oct 20, 2017 (*Note: Judge Steve Dozier did disclose he knew Federal Judge John Bryant, but not Worrick Robinson*). See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 13 of "*3rd Correction-Modification*" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, pages 130-146 of 173 at the scanned filing.

Fact: Attorney Worrick Robinson, Judge Muriel Robinson, and Potential Juror #1 Attorney Kurt Bartlett, were actively involved in Judge Steve Dozier's "*Friends of Steve Dozier*" election campaign in 2014, which took place three years prior to the Appellant's trial. At no time during pre-trial, jury selection, trial, sentencing, or during Judge Steve Dozier's artfully written and deceptive recusal order of Oct 23, 2017, did Judge Steve Dozier ever disclose his "*secret*" friendship with campaign co-chair, Attorney Worrick Robinson. See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 7 of "*3rd Correction-Modification*" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, page 69 of the 173 scanned filing.

Fact: During the jury selection process, when Judge Steve Dozier's clerk read the name of potential juror candidate #1, Attorney Kurt Bartlett, Judge Steve Dozier did not disclose that former Nashville police officer, Attorney Kurt Bartlett, was a Host Committee member for a "*Friends of Steve Dozier*" fundraiser during the election of 2014. Instead, Judge Dozier made a deceptive, humorous remark as Attorney Kurt Bartlett walked to the jury box: "We didn't plan that. Mr. Bartlett is an attorney. I didn't want him to think we pulled him out just from the get

go.” See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 28, 2021. 5 Exhibits – Motion For New Trial – 1 of 4 – Transcript of Jury Selection – Pg 26.

Fact: Judge Steve Dozier had the opportunity to fully disclose that Attorney Kurt Bartlett was a former Nashville police officer and host committee member for the “*Friends of Steve Dozier*” campaign in 2014, but Judge Steve Dozier chose to conceal the information from the Appellant as he pretended to be transparent and open in his questioning of potential Juror #1, Kurt Bartlett: “The Court: ... Is there anyone in the jury box that knows either two assistant DA’s in any way? (Affirmative response from the potential jurors). And Mr. Bartlett, that’s through-- your knowledge of them comes through your practice? Mr. Bartlett: Yes. The Court: Not anything outside or social interaction? Mr. Bartlett: No. The Court. Okay. That’s fine. We’ve had police on juries. We’ve had judges on juries. We have had lawyers on juries. So there is nothing disqualifying obviously about knowing one of the parties.” Judge Steve Dozier openly admitted during a public criminal trial that it is routine in his court for there to be “*nothing disqualifying*” about police, judges, and lawyers serving on Judge Dozier’s juries while a police, judge or attorney juror knows one of the parties in a criminal trial. 5 Exhibits – Motion For New Trial Hearing – 1 of 4 – Transcript of Jury Selection - Pg 28-29. See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 28, 2021.

Fact: Judge Dozier did not disclose that Attorney Kurt Bartlett was a host committee member for the “*Friends of Steve Dozier*” election campaign in 2014, and Attorney Kurt Bartlett did not voluntarily disclose that the Appellant had talked to him a few days earlier about possibly reviewing the Appellant’s case before the trial began on Sept 11, 2017: “Mr. Davis: I think you said you are a police officer? Mr. Bartlett: I used to be, yes. Mr. Davis: Are you familiar with Mr. Robinson? Mr. Bartlett: I am familiar with Mr. Robinson, yes. Mr. Davis: When he asked

earlier about us knowing anybody in the courtroom, did you -- I was waiting to see, but you and I spoke last Wednesday. Mr. Bartlett: Now that you mention it, and once I heard the facts of the case, I think I recall speaking with you in the hallway.” Mr. Davis: Yeah, and you gave me your business card. Mr. Bartlett: Maybe, you asked for it. Mr. Davis: Is it Kurt Bartlett: Mr. Bartlett: It is, yes.” 5 Exhibits – Motion For New Trial Hearing – 1 of 4 – Transcript of Jury Selection - Pg 97-98. See Exhibit 3 of “*Recusal Motion*” filed with the Tennessee Supreme Court on Aug 28, 2021.

Fact: Potential Juror #1, Kurt Bartlett, a former police officer and current criminal attorney who was familiar with Attorney Worrick Robinson, was the first juror candidate the Appellant struck from the jury pool with Appellant’s Ballot number 1. Appellant had never done jury selection before and felt overwhelmed by the process, but Appellant did not want anyone on his jury or a judge presiding over his trial to be a friend or kin to Attorney Worrick Robinson, or to be a friend or kin to indicted ex-Judge Casey Moreland. The FBI, U.S. Attorney and the Federal Court also held a similar opinion towards indicted Davidson County ex-Judge Casey Moreland, based upon the fact that the FBI, U.S. Attorney and the Federal Court ultimately handcuffed, arrested, convicted and permanently removed Judge Casey Moreland from his powerful position as a Davidson County Judge and placed him in Federal prison for three years to keep him from further harming the Tennessee Judicial System and vulnerable citizens who appeared before him in his public courtroom. Ex-Judge Casey Moreland, Attorney Worrick Robinson, and the Nashville Police were a jury concern for the Appellant, but Judge Alan E. Glenn intentionally ignored the reason for why the Appellant asked his “*Casey Moreland - Worrick Robinson – Nashville Police*” jury vetting based upon Judge Glenn’s written appellate court opinion: “The Defendant does not explain why the employment of the judge’s father or

uncle as police officers, if that is indeed the case, rendered the judge impartial, other than that it is the Defendant's belief that the police and the district attorney and other governmental entities are part of a vast conspiracy to silence him. See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. See "*3rd Correction-Modification*" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, Exhibit 7 on pages 67 of 173, and Exhibit 13 on pages 135-146 of 173, at the scanned filing. Appendix – Pgs 5-6.

Fact: Appellant's immediate action in striking former police officer and current criminal attorney, Kurt Bartlett, from the Appellant's jury pool demonstrates how the Appellant would not have provided his needed consent for Judge Steve Dozier to remain as the presiding judge on his criminal trial if Judge Steve Dozier had submitted to the authority of the Tennessee Constitution, Article VI, Section 11, to be honest and transparent to disclose his friendship with Attorney Worrick Robinson, or that his father, Major Tom Dozier, was the longest serving police officer in the history of Nashville with the Nashville Police Gun Range being named in his father's honor (Metro Bill # BL2012-128), or that his Uncle Don Dozier was a former Nashville police officer, or that Juror #1, Kurt Bartlett, was a former Nashville police officer who possibly was in the jury pool of the Appellant's wife a few months earlier before Judge Cheryl Blackburn. See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. TR Vol 2 – Pg 284. TR Vol 3 – Pg 349. TR Vol 3 - Pg 319 - 322.

Fact: After the jury selection process on the morning of Sept 11, 2017, Judge Steve Dozier ordered the Appellant's daughter to destroy the audio recording she had made of the jury selection process when she sat in the public courtroom watching the open proceeding: "The Court: All right. Mr. Davis, one question, and I will preface by saying you are doing a great job for what that is worth. But we had this discussion, I don't know when, several months ago about

the official court reporter and the recordings that are made, everything is recorded. Nobody is going to mistreat you in here in any way from my perspective. But why do we have your daughter recording everything? Mr. Davis: I don't have my daughter recording. I don't have--.

The Court: Okay. So you didn't know she was? Mr. Davis: No. The Court: Okay. So you would help me help her and when we get her back in, we will give her her phone, she can go to password and just record what she has-- she can erase what she has recorded. Mr. Davis: That's fine. The Court: Do you have any issues with that? Mr. Davis: No. The Court: Okay. Bring Daisy Davis back in. Court Officer: And I requested that she do it out there, so it may already be off, but she was very concerned about--.

The Court: Okay. Just let her step back in. I don't want to keep her phone. Mr. Davis: I'm not recording. I'm just--.

The Court: Yeah, that's fine. You know not to, so -- okay. Ms. Davis, and I have discussed this with your father, Mr. Davis here, he is aware that-- we have recordings of this; nobody is going to do anything that's not being recorded, but we can't have parties and witnesses recording things. So I'm not chastising you or anything, I just want to make sure that you take your phone with this young lady's assistance and just delete anything that has been recorded. Is that a problem? The witness: (Shakes head negatively). The Court: All right. We will be in recess then in 1:20."

Ex. 5 Cont – Motion For New Trial – 2 of 4 – Transcript of Trial – Vol 1 – Pgs 17-19.

Fact: Judge Dozier ordered the jury selection recording destroyed which included the “*vetting questions*” asked of potential jurors in regard to Attorney Worrick Robinson, ex-Judge Casey Moreland, and the Nashville Police Department. Judge Steve Dozier ordered the destruction of the jury selection recording while defrauding the Appellant and intentionally concealing his “*friendship*” with Attorney Worrick Robinson. The destruction of the jury selection recording made it impossible to verify the accuracy of the jury selection transcript since

the State of Tennessee exclusively possesses the only audio-video recording of the Appellant's jury trial selection and numerous requests for access to the audio-video recording were denied. Also, the Appellant did not receive the jury selection transcript until after Judge Cheryl Blackburn had a final hearing on the Appellant's New Trial motion on July 12, 2019, which is documented in Footnote 2 of the denied New Trial Order: "At the hearing, defense counsel advised he had a copy of the trial testimony, but he had not received the requested transcript of voir dire. The court reporter provided the Court and counsel a copy of the voir dire transcript on July 24, 2019. The Court designates the voir dire and trial transcripts as collective Late-Filled Exhibit 5." TR Vol 4 – Pg 445.

Fact: The Appellant's post-sentencing discovery and exposure of Judge Steve Dozier's "*friendship*" with Worrick Robinson forced Judge Dozier to write a dishonest and deceptive 2-page recusal order which still intentionally concealed his "*friendship*" with "*Friends of Steve Dozier*" campaign fundraiser co-chair, Attorney Worrick Robinson. Judge Steve Dozier's calculated 2-page judicial recusal order was the final deceptive action of Judge Dozier's 14-month assignment as presiding judge of the Appellant's case, and his "*secret*" friendship with Attorney Worrick Robinson was not disclosed in the Oct 23, 2017 recusal letter, and is still not disclosed by Judge Steve Dozier or Attorney Worrick Robinson to the Appellant as of Aug 26, 2021. See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 7 of "*3rd Correction-Modification*" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, page 69 of the 173 scanned filing.

Fact: Attorney Worrick Robinson attended the Appellant's sentencing hearing on Sept 28, 2017, and the Appellant did openly state that Covenant Member Worrick Robinson and all the court officers were involved in a child sex abuse cover-up in the public courtroom, but Judge

Steve Dozier was skillful to defraud the Appellant and intentionally chose not to reveal his “*secret*” friendship with Attorney Worrick Robinson, or that Worrick Robinson had been a “*Friends of Steve Dozier*” campaign co-fundraiser chair in 2014: “The Court. All right. Do you care to be heard, Mr. Davis? Mr. Davis. It should have only taken one email. It should have only taken one visit to the DA’s office and the police office. There is a child-molestation cover up did go down and Worrick Robinson, who is sitting in the room is involved in it. And so you can say whatever you want to say, that’s what happened and just because everybody has covered up including you all... Mr. Davis: Well, I mean, I’m being accused of being a creep pee stalker is what was told to the jury. I have a lot of issues with the trial. I have a lot of issues with the fact that Judge Casey Moreland, close friend of Worrick is the one that bound me over for indictment. So I have a lot of issues.” Again, Judge Steve Dozier had the ample opportunity to disclose his friendship with Attorney Worrick Robinson, or that Worrick Robinson had been a campaign fundraiser co-chair for “*Friends of Steve Dozier*” during the election of 2014, but Judge Dozier intentionally defrauded the Appellant and chose to conceal his “*friendship*” with Attorney Worrick Robinson, thereby denying the Appellant a fair, impartial judiciary. TE Vol 10 – Pgs 8-9.

Fact: Judge Steve Dozier had a final opportunity to be open, honest and transparent with the Appellant when he wrote his dishonest and deceptive 2-page recusal order on Oct 23, 2017, while the Appellant was locked away in jail on his third day of eighteen days in jail. Instead of being open, honest and transparent, Judge Steve Dozier continued to defraud the Appellant by concealing his “*friendship*” with Attorney Worrick Robinson in violation of Article VI, Section 11 of the Tennessee Constitution, and the Tennessee Supreme Court Code of Judicial Conduct Rule 10 and Rule 10B. Judge Steve Dozier’s recusal order pretended to be upright, transparent

and honest, but Footnote 1 is now a final piece of evidence documenting Judge Steve Dozier's abuse of judicial power to conceal his undisclosed "*friendship*" with Attorney Worrick Robinson, thereby denying the Appellant a "*fair day in court*" and a fair, impartial judiciary. Footnote 1 on the bottom of the recusal order states: "Part of the mass email contained information concerning the Court and photographs of the Court. The Court has not thoroughly reviewed the new emails but is aware that, apparently, the Defendant claims some conflict of interest based on the Court's uncle, at some point, being a member of CPC. The Defendant has not filed a motion to recuse, but the Court considers the Defendant's allegations as such. The Defendant's premise toward the Court is based upon inaccurate information. At or before trial, the Court had no information regarding the church membership of an uncle. If it analyzed the Defendant's current mailing, the Court may know dozens of former or current members of CPC. However, this information would have no bearing on this case or be determinative on whether the Defendant could or did receive a fair trial and/or sentence." TR Vol 3 – Pgs 316-317.

Fact: Judge Steve Dozier's 2-page recusal order, which cited court "*photographs*," did not mention photographs of Judge Steve Dozier's uncle, Don Dozier, a former Nashville Police officer, who referred to Dr. Martin Luther King, Jr. as "*Martin Lucifer*." Judge Steve Dozier's 2-page recusal order also did not mention photographs of Covenant Member Worrick Robinson, or photographs of Judge Steve Dozier's father, Major Tom Dozier, the longest serving member of the Nashville Police Department, or that former Nashville Police Sgt. Richard Hillenbrand was a pallbearer at Major Tom Dozier's funeral. Sgt. Richard Hillenbrand was the grand jury foreman for Tennessee Titans Quarterback Steve McNair's unsigned secret grand jury report, and Sgt. Hillenbrand was also involved in a "*sex – cocaine*" scandal that rocked the Nashville Police Department in 1988.

See Exhibit 3 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021. See Exhibit 13 of "*3rd Correction-Modification*" Motion filed with Tennessee Court of Criminal Appeals on June 29, 2020, pages 135-146 of 173, at the scanned filing. See Exhibit 8 of "*7th Post-Judgment Motion*" filed with Tennessee Court of Criminal Appeals on June 1, 2021, page 41 of 62, at the scanned link. TR Vol 3 – Pg 349.

Fact: Appellant made a comparison to Bull Connor and Worrick Robinson during a pre-trial hearing on April 20, 2017: "Mr. Davis: ... So if the State wants to do that, wants to become Bull Connor and Worrick Robinson, and that's what Nashville wants to have. Worrick is one of the reasons I am here. The Court: Okay. Do you have any pre-trial motions that you are going to file." Judge Dozier ignored the Appellant's comment and intentionally did not disclose his prejudicial "*friendship*" with Covenant Member Worrick Robinson, campaign fundraiser co-chair for "*Friends of Steve Dozier*" in 2014, or that his Uncle Don Dozier and Aunt Chris Dozier were members of Covenant Presbyterian Church. If Judge Dozier intentionally concealed his "*friendship*" with Worrick Robinson while writing his Oct 23, 2021 recusal order, why do Judge Alan E. Glenn and the Tennessee Court of Criminal Appeals believe Judge Dozier's recusal order statement which claims Judge Dozier did not know his uncle was a Covenant Member. As further evidence of Judge Steve Dozier's skilled prejudice against the Appellant, Judge Dozier banned the Appellant from saying "*Bull Connor*" during the Appellant's trial. Bull Connor ordered the arrest of Dr. Martin Luther King, Jr., in April 1963 which resulted in Dr. King's "*Letter From a Birmingham Jail.*" TE Vol 8 – Pg 8. TR Vol 3 Pg 349. TR Vol 2 – Pg 271.

Fact: Covenant Member Worrick Robinson attended the Appellant's probation hearing before Judge Cheryl Blackburn on Nov 6, 2017, and Judge Cheryl Blackburn knew who Attorney Worrick Robinson was as he sat in the courtroom with other members of the public.

“The Court: Okay. All right. Well I see Mr. Robinson is here.” Attorney Worrick Robinson also had a final opportunity to step forward to disclose any “*friendship*” he had with Judge Steve Dozier, or any exculpatory information he knew about involving the John Perry child sex abuse cover-up at Covenant Presbyterian Church, but Attorney Worrick Robinson chose to remain silent while the Appellant was shackled and jailed. TE Vol 11- Pg 5, 8.

Fact: On June 29, 2021, Montgomery Bell Academy Alumnus, Judge Alan E. Glenn, wrote an appellate opinion in support of the judicial and ethical conduct of Judge Steve Dozier. Judge Glenn wrote; “The Defendant has failed to show any reason that the judge’s impartiality could reasonably be questioned... There is also nothing in the record to show that either the trial judge or the probation revocation judge was in any way influenced by, or even acquainted with, Mr. Robinson.” Montgomery Bell Academy Alumnus, Judge Alan E. Glenn, refused to recuse from the Appellant’s case even though Judge Glenn has an obvious “*conflict of interest*” with Montgomery Bell Academy Headmaster, Brad Gioia, who contacted Nashville Police prior to the Appellant’s arrest on Oct 20, 2017. Brad Gioia wrote an email to MBA faculty, staff and parents which stated: “I have contacted MBA security as well as Metro Police. I have asked the police not to allow this parent on campus.” About two and a half hours after MBA Headmaster Brad Gioia sent the MBA community his email, the Appellant was handcuffed and arrested in his private family residence in front of his MBA son and jailed for 18-days for an alleged probation violation. TR Vol 3 - Pg 331

Fact: On April 6, 2018, Montgomery Bell Academy Headmaster Brad Gioia falsely testified against the Appellant before Judge Cheryl Blackburn who refused to recuse from the Appellant’s case. Mr. Gioia testified that the Appellant’s wife had “*threatened*” him with a February 9, 2018 email: “Q. Okay. All right. And so when you received the October email,

the February 7 and February 9 emails, you considered them as veiled threats, did you think there could be some imminent threat of harm or injury when you received those? A. Well, I certainly had that feeling directly from a number of phone calls I received. Q. Uh-huh. A. Personally, I probably felt it more in February when I sensed that his feelings were more intense because of the jail time he served. I don't know that I felt it so intensely, but it bothered me." TE Vol 13 – Pg 11.

Fact: Appellant also testified before Judge Cheryl Blackburn following the sworn testimony of Montgomery Bell Academy Headmaster Brad Gioia: "Q. Mr. Davis, you expressed your desire to testify. Is there anything you would like to add to this hearing? A. Yeah. I was trying to communicate with people about a child sex abuse cover-up and its connection to the rape of a, an alleged rape of a sixth grade student. Q. Okay. But--. A. I'm not trying to scare anybody. I haven't threatened anybody in the emails or anything. I mean people can turn me into a monster and a threat, but basically I have been looking after the protection of kids. The Court: Okay, Mr. Davis, that is an issue I think that has gotten you in a lot of trouble. A. It shouldn't. The Court. Well. But you keep emailing and, correct me if I'm wrong, e-mailing and sending out all these mass emails about that, and people don't want to hear about that. A. Well the DA's office should be prosecuting child-molesters instead of covering them up. The Court: Okay. Well, that's their, up to them. Okay. That's not up to you. Okay? ... A. There's a molester living on Belle Meade Boulevard about twelve doors away from-- The Court: Okay, Mr. Davis, that is not-- ... A. She's asking me why, because I don't want to be shackled on that issue. The Court: Well. You're going to be shackled on that issue, one way or another, and that would be by me telling you something or I'm going to put you in jail again..." TE Vol 13 – Pgs 21-23.

VI. TENN. R. APP. P. 11(b)(4) STATEMENT OF THE REASONS SUPPORTING REVIEW

The Tennessee Supreme Court should grant review of the Appellant's petition for two reasons: (1) "[T]he need to settle questions of public interest[.]" See Tenn. R. App. P. 11(a)(3). (2) "[T]he need for the exercise of the Supreme Court's supervisory authority," see Tenn. R. App. P. 11(a)(4).

Appellant believes the Tennessee Supreme Court should grant review of the Appellant's petition to settle questions of public interest, including whether child sex abuse whistleblowers should be wrongfully prosecuted in Tennessee instead of protected child-molesters. Also, the public has a constitutional right to know what is taking place taken place in a Davidson County public courtroom during the Appellant's exposure of a child sex abuse cover-up case, which includes the active involvement of Judge Steve Dozier and Attorney Worrick Robinson, and also includes the active involvement of WSMV TV (Meredith Corporation).

After the Appellant was arrested on Nov. 15, 2015, following a MEDIA phone call to Nashville Police on Oct 25, 2015, WSMV TV Attorney Robb Harvey, a Montgomery Bell Academy alumnus father, sent the Appellant a threatening, untrue email which stated: "I am counsel for WSMV and Demetria Kalodimos. Recently, you have been sending a number of emails to, and about, Ms. Kalodimos and WSMV. My clients consider your communications both disturbing and threatening. The email is notice to you to immediately cease any further email or other communications with Ms. Kalodimos. Do not attempt to approach her in public, as you have done in the past. Any communication to Ms. Kalodimos must go through me. Thank you for your anticipated, and required, cooperation. Robb S. Harvey Attorney Waller."

TR Vol 2 – Pg 200. TR Vol 3 – 347.

During the Appellant's trial before Judge Steve Dozier on Sept 12, 2017, Asst. DA Jenny Charles cross-examined the Appellant's wife about WSMV TV anchor woman Demetria Kalodimos: "Q. I know Demetria Kalodimos asked your husband to stop following her. Your husband told us yesterday he was banned from Julia Green Elementary School? A. Okay. All right. Could you stop right there with those two incendiary statements." Asst. DA Jenny Charles did not provide the Court a sworn statement from WSMV TV anchor, Demetria Kalodimos, nor did Ms. Kalodimos testify under sworn oath during the Appellant's trial before Judge Steve Dozier. Exhibit 5 cont. – Motion For New Trial Hearing – 3 of 4 – Transcript of Trial Vol 2 – Pgs 21 – 22

The Tennessee Judicial System governed by the Tennessee Supreme Court has a duty to be open and transparent about the possible failure of the judicial system, and two alleged child sex abuse crimes across state lines, following the recent allegations made by 14-year old, Gracie Solomon, daughter of former WSMV TV news anchor, Aaron Solomon, a long-time colleague with WSMV TV news anchor, Demetria Kalodimos. See Exhibit 8 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021.

On May 12, 2021, a You Tube video was posted of 14-year old, Gracie Solomon, entitled "*A Cry For Help*" which made serious allegations about child sex abuse across state lines allegedly committed by Gracie Solomon's father, former WSMV TV news anchor, Aaron Solomon.

Brentwood Attorney Larry Crain, represents Grace Chapel Church where Aaron Solomon has attended and is friends with former Grace Chapel Pastor Steve Berger. Attorney Larry Crain also represents protected child-molester John Perry, and John Perry's child sex abuse Victim #1, and Attorney Crain filed a \$3 million "*invasion of privacy – defamation*" lawsuit against the

Appellant which served to further protect child-molester John Perry and a Mann Act Federal crime cover-up.

On June 16, 2021, sixteen days before Judge Alan E. Glenn filed his June 29th opinion denying the Appellant's appeal, Attorney Larry Crain wrote and sent a "*cease and desist*" letter to Medium writer Shannon Ashley on behalf of Grace Chapel Church. Gov. Bill Lee and First Lady Maria Lee, Michael W. Smith, and Sen. Jack Johnson and Judge Deanna Johnson all attend Grace Chapel Church. Medium Writer Shannon Ashely's blog article reported information based upon Gracie Solomon's You Tube video which claimed that former WSMV TV anchor, Aaron Solomon, allegedly molested his 11-year old daughter across state lines in Asheville, North Carolina, and also allegedly murdered his own son, Grant Solomon, who was planning to protect his 14-year old sister after he turned 18 a month before his death. See Exhibit 8 of "*Recusal Motion*" filed with the Tennessee Supreme Court on Aug 27, 2021.

Brentwood Attorney Larry Crain is directly connected to four alleged child sex abuse cases in Davidson County and Williamson County: 1) John Perry child sex abuse cover-up case; 2) Brentwood Academy alleged gang rape of a 6th grade student; 3) Fellowship Bible Church rape case of a 3-year old child, and the alleged sexual assault of a 2nd three-year old child with the lawsuit settled and sealed in Williamson County before Judge Deanna Johnson; 4) Gracie Solomon alleged child sex abuse cover-up case, and the alleged murder of her brother, Grant Solomon.

Former WSMV TV anchor, Aaron Solomon, long-time colleague of WSMV TV anchor Demetria Kalodimos, withdrew a defamation lawsuit against numerous adults and minors to re-file his lawsuit in Federal Court on June 29, 2021, the very same day that Judge Alan E. Glenn filed his June 29th opinion denying the Appellant's appeal for a New Trial. The very next day,

on June 30, 2021, Aaron Solomon's defamation lawsuit was assigned to Judge William "Chip" Campbell, Jr., who won dismissal from two John Perry related child sex abuse cover-up lawsuits as an attorney against the Appellant via fraud and deception before the Court. See Exhibit 8 of "Recusal Motion" filed with the Tennessee Supreme Court on Aug 27, 2021.

In addition to settling questions of public interest, Appellant believes the Tennessee Supreme Court should grant the Appellant's petition to exercise the Supreme Court's supervisory authority to ensure the integrity of the Tennessee Judicial System, and the Appellant's constitutional right to a "fair day in court" and a fair, impartial judiciary.

Judge Steve Dozier presided over the Appellant's pre-trial, jury selection, jury trial, and sentencing hearing from Aug 24, 2016 - Oct 23, 2017. During the fourteen month period, Judge Steve Dozier intentionally defrauded the Appellant by concealing his "friendship" with Covenant Member Worrick Robinson, campaign fundraiser co-chair for "Friends of Steve Dozier" during the election of 2014, thereby denying the Appellant a "fair day in court" and a fair, impartial judiciary as promised by the Tennessee Constitution, Article VI Section 11, and the Tennessee Supreme Court Rule 10 Code of Judicial Conduct.

Judge Alan E. Glenn, a Montgomery Bell Academy Alumnus, served initially on a secret panel of three appellate court judges from Feb 10, 2021 thru June 29, 2021. During the four and a half month period, Judge Alan E. Glenn refused to recuse from the Appellant's case and did not disclose to the Appellant that he had a "conflict of interest" with Montgomery Bell Academy as an alumnus of Montgomery Bell Academy, thereby denying the Appellant a "fair day in court" and a fair, impartial judiciary.

Judge Alan E. Glenn, a Montgomery Bell Academy alumnus, referenced in his judicial opinion some email communications the Appellant sent to parents of students at Montgomery

Bell Academy, which led the State of Tennessee to obtain an additional MBA “no contact” ban against the Appellant, a Montgomery Bell Academy alumnus father. The additional MBA “no contact” ban punished and prohibited the Appellant from contacting any of the Montgomery Bell Academy faculty, or staff, or their families, or anyone else connected with the school, about the Appellant’s “righteous efforts” to expose corruption and a child sex abuse cover-up within the Montgomery Bell Academy community, which included Judge Alan E. Glenn, an alumnus of Montgomery Bell Academy. Appendix – Page 3.

Judge Alan E. Glenn, a Montgomery Bell Academy alumnus, was protected by Judge Cheryl Blackburn’s order prohibiting any “contact” initiated by the Appellant, and thereby Judge Alan E. Glenn possessed an inherent “conflict of interest” as one protected by the MBA “no contact” ban, to the advantage of the Montgomery Bell Academy community, thereby denying the Appellant a fair, impartial judiciary as promised by the Tennessee Constitution, Article VI Section 11, and the Tennessee Supreme Court Rule 10 Code of Judicial Conduct.

On Feb 10, 2021, Appellant filed a motion for all three appellate court judges on the unidentified secret appellate panel to recuse from the Appellant’s case, and on Feb 24, 2021, Presiding Judge John Everett Williams denied the Appellant’s recusal motion.

On March 3, 2021, March 18, 2021, and March 29, 2021, Appellant filed motions for court review of Presiding Judge John Everett Williams recusal decision, and all three court review motions were denied by Tennessee Court of Criminal Appeal Judges, Timothy L. Easter, J, Ross Dyer, and Robert L. Holloway, Jr, all who were appointed by Republican Governor Bill Haslam.

On April 19, 2021, Appellant filed a recusal appeal with the Tennessee Supreme Court two months prior to the appellate court ruling authored by Judge Alan E. Glenn, but Appellant's recusal appeal was denied as "*untimely*" by the Tennessee Supreme Court on April 22, 2021.

Since the merit of the recusal appeal filed with the Tennessee Supreme Court on April 19, 2021, was not considered and the recusal appeal was denied as "*untimely*," Appellant prays the Tennessee Supreme Court will exercise "*nostra sponte*" to examine all facts within the record, and post-judgment facts, to grant the Appellant's Rule 11 application based upon the need for the Tennessee Supreme Court to exercise their Supreme Court authority in the best interest of substantial justice, and in the public's best interest to be informed about the John Perry – Mann Act Federal crime cover-up, which also involved WSMV TV and the powerful Meredith Corporation.

Appellant argues that Judge Steve Dozier had a sober duty to inform the Appellant of his undisclosed friendship with Covenant Member Worrick Robinson, however, Judge Alan E. Glenn disagreed in his June 29th judicial opinion: "The Defendant contends on appeal that he was denied a fair trial due to the trial judge's relationship with several individuals. Specifically, he complains that the trial judge was prejudiced against him and should have recused himself due to his association with: Covenant Presbyterian Church member and Nashville attorney Worrick Robinson... The State responds that the Defendant... did not file any motion for the trial judge to recuse... The Defendant has failed to show any reason that the judge's impartiality could reasonably be questioned... There is also nothing in the record to show that either the trial judge or the probation revocation judge was in any way influenced by, or even acquainted with, Mr. Robinson." Appendix – Pgs 4-5.

For clarity, the Appellant did not file a motion for Judge Steve Dozier to recuse from the Appellant's case because the Appellant did not know about Judge Dozier's uncle Don Dozier, or his undisclosed "*friendship*" with Attorney Worrick Robinson, until after his sentencing hearing on Sept 28, 2017. Prior to filing a recusal motion to disqualify Judge Steve Dozier after the sentencing of the Appellant and before the New Trial Motion deadline of Oct 27, 2017, the Appellant provided truthful information about Judge Steve Dozier, Uncle Don Dozier, Attorney Worrick Robinson, and numerous connections between the John Perry child sex abuse cover-up case and the alleged gang rape of a 6th grade student at Brentwood Academy to the MBA and Brentwood Academy communities. In retaliation, the Appellant was arrested on Oct 20, 2017, prior to the MBA vs. BA football game, and three days after the Appellant was jailed, Judge Steve Dozier wrote a calculated and deceptive recusal order to remove himself from the Appellant's case on Oct 23, 2017. Four days later on Oct 27, 2017, the Appellant filed a New Trial motion from jail in timely fashion, but Judge Steve Dozier had already recused from the Appellant's case.

Judge Alan E. Glenn, a Montgomery Bell Academy alumnus, wrongly placed the recusal burden fully upon the Appellant instead of Judge Steve Dozier because the Defendant did not file a recusal motion. However, the Tennessee Supreme Court issued a ruling on Aug 25, 2021, which stated a Tennessee Judge was obligated to recuse himself even though a Defendant did not file a motion of recusal with the Court (*Brice Cook vs. State of Tennessee (Case # No. W2018-00237-SC-R11-PC)*).

Justice Cornelia Clark wrote: "The State argues that the petitioner waived this claim by failing to move for recusal either when the post-conviction judge made the inappropriate comments or during the fifty-one days that elapsed between the oral ruling and entry of the order

denying relief. We conclude that waiver is not determinative in the circumstances of this case. As already explained, Rule of Judicial Conduct 2.11 obligates a judge to recuse himself or herself “in any proceeding in which the judge’s impartiality might reasonably be questioned,” even if no recusal motion is filed.”

Judge Dozier’s Oct 23rd recusal was effectively an admission of guilt, especially since he defrauded the Appellant for 14 months and did not disclose his “*friendship*” with Covenant Member Worrick Robinson, a campaign fundraiser co-chair for “*Friends of Steve Dozier*” during the election of 2014, and still has not disclosed his “*friendship*” with Covenant Member Worrick Robinson as of Aug 26, 2021.

Justice Cornelia Clark also cited the supervisory power of the Tennessee Supreme Court: “As a result, if, in a future case, this Court determines that a judge has habitually made inappropriate comments that call into reasonable question the judge’s impartiality in a particular category of cases, this Court will not hesitate to hold, in the exercise of its supervisory power over the Judicial Department, that the judge is disqualified from hearing all future cases in that category. See Tenn. Const. art. VI, § 1; Moore-Pennoyer v. State, 515 S.W.3d 271, 276 (Tenn. 2017) (citing cases); see also Tenn. Code Ann. § 16-3-501 (2009) (describing this Court’s “general supervisory control over all the inferior courts of the [S]tate”); id. § 16-3-503 (declaring that the Supreme Court has “the power inherent in a court of last resort”); id. § 16-3-504 (declaring that the Supreme Court has “a broad conference of full, plenary[,] and discretionary power”).”

The Tennessee Supreme Court has said that: “The right to a fair trial before an impartial tribunal is a fundamental constitutional right.” State v. Austin, 87 S.W.3d 447, 470 (Tenn. 2002).

Tennessee courts have repeatedly maintained that “Public confidence in the performance and impartiality of the judiciary is maintained only when judges rigorously adhere to the Code of Conduct. Violations of the Code, if left unaddressed, diminish public confidence and injure the entire judicial system.” *In re Bell*, 344 S.W.3d 304, 320 (Tenn. 2011) (quoting *In re Williams*, 987 S.W.2d 837, 844 (Tenn. 1998)).

Tennessee litigants are entitled to have cases resolved by fair and impartial judges. *Davis v. Liberty Mut. Ins. Co.*, 38 S.W.3d 560, 564 (Tenn. 2001); *Leighton v. Henderson*, 414 S.W.2d 419, 421 (Tenn. 1967) (stating that the Tennessee Constitution entitles litigants to the “cold neutrality of an impartial court”); *Kinard v. Kinard*, 986 S.W.2d 220, 227 (Tenn. Ct. App. 1998) (same); *Alley v. State*, 882 S.W.2d 810, 820 (Tenn. Crim. App. 1994) (same). Judges must be fair and impartial both in fact and in perception. *State v. Reid*, 213 S.W.3d 792, 815 (Tenn. 2006) (“[T]he preservation of the public’s confidence in judicial neutrality requires not only that the judge be impartial in fact, but also that the judge be perceived to be impartial.” (quoting *Kinard*, 986 S.W.2d at 228)).

Specifically our Supreme Court has said, “[i]f the public is to maintain confidence in the judiciary, cases must be tried by unprejudiced and unbiased judges.” *Davis v. Liberty Mut. Ins. Co.*, 38 S.W.3d 560, 564 (Tenn. 2001).

The state’s interest in preserving public confidence in the judiciary has even been described as “compelling.” *Bd. of Prof’l Responsibility v. Parrish*, 556 S.W.3d 153, 166 (Tenn. 2018) (quoting *Disciplinary Counsel v. Gardner*, 793 N.E.2d 425, 432 (Ohio 2003)).

Furthermore, “preservation of the public’s confidence in judicial neutrality requires not only that the judge be impartial in fact, but also that the judge be perceived to be impartial.” *Kinard v. Kinard*, 986 S.W.2d 220, 228 (Tenn. Ct. App. 1998).

Under the Tennessee Supreme Court Code of Judicial Conduct Rule 10, Canon 2.11 (A): "[a] judge shall disqualify himself or herself in any proceeding in which the judge's impartiality might reasonably be questioned." Tenn. Sup Ct. R. 10. Canon 2.11 (A). A trial court should grant a recusal motion when "the judge has any doubt as to his or her ability to preside impartially in the case" or "when a person of ordinary prudence in the judge's position, knowing all the facts known to the judge, would find a reasonable basis for questioning the judge's impartiality." Davis vs. Liberty Mut. Ins. Co., 38, S.W.3d 560, 564-565 (Tenn 2001) (quoting Alley v. State, 882, S.W.2d 810, 820 (Tenn. Crim. App. 1994). Therefore, even if a judge believes that he or she can be fair and impartial, the court should grant the motion for recusal when "the judge's impartiality might be reasonably questioned" because "the appearance of bias is as injurious to the integrity of the judicial system as actual bias." Id. (internal quotation omitted); see also Bean vs. Bailey, 280, S.W.3d 798, 805 (Tenn. 2009). A litigant has a fundamental right to have a case heard by fair and impartial judges. Bean vs. Bailey, 280, S.W.3d 798, 803, (Tenn. 2009).

VII. CONCLUSION

For the foregoing reasons, and because "*fraud vitiates everything*," the Appellant's Rule 11 application should be GRANTED.

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 Postal Service, first class, postage pre-paid, on Aug 27, 2021, to the following parties:

Attorney General Herbert Slatery
General David Findley
Office of the Tennessee
Attorney General
301 6th Avenue North
Nashville, TN 37243

Respectfully Submitted,



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IN THE COURT OF CRIMINAL APPEALS OF TENNESSEE
AT NASHVILLE

Assigned on Briefs February 10, 2021

STATE OF TENNESSEE v. WILLIE AUSTIN DAVIS

**Criminal Court for Davidson County
No. 2017-A-62**

No. M2019-01852-CCA-R3-CD

JUDGMENT

Came the Defendant, Willie Austin Davis, pro se, and the State, by the Attorney General, and this case was heard on the record on appeal from the Criminal Court for Davidson County; and upon consideration thereof, this Court is of the opinion that there is no error in the judgment of the trial court.

It is, therefore, ordered and adjudged by this Court that the judgment of the trial court is affirmed, and the case is remanded to the Criminal Court for Davidson County for execution of the judgment of that court and for collection of costs accrued below.

Costs of the appeal are taxed to the Defendant, Willie Austin Davis.

Alan E. Glenn, Judge
John Everett Williams, Presiding Judge
Robert W. Wedemeyer, Judge

FILED

06/29/2021

Clerk of the
Appellate Courts

Appendix

IN THE COURT OF CRIMINAL APPEALS OF TENNESSEE
AT NASHVILLE

Assigned on Briefs February 10, 2021

FILED

06/29/2021

Clerk of the
Appellate Courts

STATE OF TENNESSEE v. WILLIE AUSTIN DAVIS

Appeal from the Criminal Court for Davidson County
No. 2017-A-62 Cheryl A. Blackburn, Judge

No. M2019-01852-CCA-R3-CD

The Defendant, Willie Austin Davis, was convicted by a Davidson County Criminal Court jury of aggravated criminal trespass, a Class A misdemeanor, based on his entering the property of a Nashville church from which he had been banned. On appeal, the pro se Defendant argues that he was denied a fair trial due to the trial judge's failure to disclose his relationships with former and current members of the church and others. Following our review, we affirm the judgment of the trial court.

Tenn. R. App. P. 3 Appeal as of Right; Judgment of the Criminal Court Affirmed

ALAN E. GLENN, J., delivered the opinion of the court, in which JOHN EVERETT WILLIAMS, P.J., and ROBERT W. WEDEMEYER, J., joined.

Willie Austin Davis, Nashville, Tennessee, Pro Se.

Herbert H. Slatery III, Attorney General and Reporter; David H. Findley, Senior Assistant Attorney General; Glenn R. Funk, District Attorney General; and Jenny Charles and Chandler Harris, Assistant District Attorneys General, for the appellee, State of Tennessee.

OPINION

FACTS

This case arises out of the Defendant's entering onto the grounds of the Covenant Presbyterian Church ("the Church" or "Church") in Nashville, of which he had formerly been a deacon, after he had been repeatedly warned to stay off the property. From the trial transcript and the pro se Defendant's voluminous, disjointed, and wide-ranging court filings in the case, we have gleaned that the Defendant became convinced that the Church's

elected group of ruling elders, known as the "Session," was protecting a former member and deacon of the Church who was excommunicated from the Church after [REDACTED] revealed that he had sexually abused [REDACTED] when [REDACTED] was a child. The Defendant believes that the Church was involved in a coverup of the child abuse because it did not take what he considered sufficient action against the former church member. Although it is not entirely clear, it appears that [REDACTED] divulged the childhood abuse in counseling sessions after [REDACTED] had turned eighteen but that [REDACTED] expressed no interest in pursuing the matter legally. The Defendant apparently believes that the Metro Nashville Police Department and other municipal, state, and federal governmental officials are involved in a vast conspiracy and coverup because, according to the Defendant, law enforcement officers to whom he reported the abuse falsely informed him that the statute of limitations for criminal prosecution of the abuser had run.

Sometime in 2002, the Defendant began a mass email-and-letter-writing campaign about the situation to members of the Church and to the Church leadership. Apparently, the Defendant also at some point in the saga sent mass emails and/or letters to the parents of school children at several schools in the Nashville area, including Harpeth Hall and Montgomery Bell Academy. The Church Session was motivated to action by an email the Defendant sent to every Church member in 2008 in which he named a certain Sunday as "an appropriate time for six years of lies and slander to come to an end." That email alarmed Church members so much that the Session, after consultation with one of their attorney members, Worrick Robinson, had the Clerk of the Session send a letter to the Defendant informing him that he was not welcome on the Church's property and would be considered a trespasser if he appeared. After receipt of the letter, the Defendant, by his own account, entered or attempted to enter the Church property on multiple occasions. On at least several of those occasions he was either blocked from entry by armed security guards hired by the Church or was asked to leave by Church elders.¹

On October 25, 2015, the Defendant was escorted from Sunday services at the Church by Metro Nashville police officers who had been called to the scene by a member of the Church leadership. At that time, the Defendant acknowledged to an officer that he had read and understood the 2008 letter from the Session and was aware that his presence on the Church property frightened church members. He was warned by one of the police officers that he would be arrested for criminal trespass if he entered the property again. The Defendant once again entered Church property on November 15, 2015. He was promptly arrested and subsequently indicted for Class B misdemeanor aggravated criminal trespassing. A superseding indictment was later returned elevating the charge to Class A

¹According to the testimony of an elder, additional security measures the Church implemented included locking Church doors and instituting a more secure procedure for children to be checked in and out of the Church and the school. At some point, the pastor of the Church also began to wear a bulletproof vest.

misdemeanor aggravated criminal trespassing based on the fact that there was a private elementary school operating on the Church grounds. See Tenn. Code Ann. § 39-14-406(c).

The Defendant was tried and convicted of the indicted charge by a Davidson County Criminal Court jury in September 2017. The Defendant's defense strategy consisted of attempting to prove that the Session lacked the authority to ban him from the Church property and that its members, along with the pastor, were attempting to thwart the Defendant's righteous efforts to expose Church corruption and child sex abuse. The Defendant elicited testimony from State and defense witnesses about the former Church member's behavior, the failure of the Church leadership to immediately excommunicate the member or contact the police when the abuse first came to light, and the fact that many of the members of the Church who once held leadership positions had since left the Church to form splinter churches in the community. Through his wife and daughter, the Defendant introduced evidence that he and his wife had been intricately involved with the Church from its formation, that the Church had once played an enormous role in their lives, and that the Defendant had filed three separate lawsuits against the Church since his dispute with the Church leadership began.

The Defendant was sentenced by the trial court to eleven months, twenty-nine days, to be served on supervised probation. Among the conditions of his probation were that he have no contact with any current or former member of the Church. A probation violation warrant was filed approximately one month later based on the Defendant's October 20, 2017 unsolicited email correspondence with members of the Church. The trial judge who had presided over the trial recused himself from further proceedings, noting in a footnote in the order of recusal that the Defendant's latest batch of emails contained photographs of the judge and a claim that the judge should have recused himself because the judge's uncle at one point had been a member of the Church. The judge stated in the order that he had had no information regarding the church membership of his uncle before or during the trial. The judge further stated that it was possible that if he examined the Church's mailing lists, he might know dozens of former or current members of the Church but that it would not have any bearing on his ability to conduct an impartial trial. In a second footnote, the judge noted that the Defendant had been arrested and was incarcerated on a probation violation warrant that had been signed by a different judge during a time when the trial judge was out of town.

At the conclusion of the probation violation hearing, which was presided over by the judge who had signed the probation violation warrant, the trial court found that the Defendant had violated the terms of his probation and revoked and reinstated the probation. After the Defendant sent more unsolicited and unsettling mass email communications to the headmaster and parents of students at Montgomery Bell Academy, the State sought and obtained a modification of the terms of the probation to prohibit the Defendant from

contacting any of the Montgomery Bell Academy faculty or staff or their families or anyone else connected with the school.²

The Defendant was represented by different attorneys at the probation hearings and at the July 12, 2019 hearing on his motion for new trial. Among the issues he raised in his amended motion for new trial was that the trial court erred “in not disclosing before trial certain relations that may have provided a motion under Rule 10B for the disqualification of [the trial judge].” Following the trial court’s September 17, 2019 denial of his motion for a new trial, the Defendant, acting pro se, filed a notice of appeal to this court. Thereafter, the Defendant filed a pro se brief and reply brief, as well as numerous pro se motions asking this court to consider wide-ranging and irrelevant post-judgment facts that the Defendant apparently believes demonstrate the vast conspiracy that exists to prevent him from exposing corruption and child abuse in the Church and the greater community.³

ANALYSIS

The Defendant contends on appeal that he was denied a fair trial due to the trial judge’s relationships with several individuals. Specifically, he complains that the trial judge was prejudiced against him and should have recused himself due to his association with: Covenant Presbyterian Church member and Nashville attorney Worrick Robinson; State’s witness John Bryant, a former federal magistrate and Covenant Presbyterian Church elder who had once been a member of the same Baptist church as the trial judge; the judge’s father, who was a major with the Metropolitan Nashville Police Department; and the judge’s uncle, who was a Covenant Church member at the time of the Defendant’s arrest and was a former Metropolitan Nashville police officer. The Defendant additionally argues that the trial judge who presided over his probation revocation and modification proceedings should have recused herself due to “the power, relationships and influence of Attorney Worrick Robinson.” The State responds that the Defendant has waived the issue by his failure to file a recusal motion in the trial court and that he cannot show that plain error relief is warranted.

The record reflects that the Defendant never brought up the trial judge’s relationships with the various individuals prior to, during, or immediately after the trial and did not file any motion for the trial judge to recuse himself. We agree, therefore, that the issue is limited to plain error review. To be entitled to relief under the doctrine of plain

²The headmaster of the school testified at the modification hearing that the Defendant frightened parents by warning that the recipients of the email needed to read the attachments before the school’s homecoming game.

³We have reviewed the Defendant’s multiple motions and concluded that they are no well taken. Accordingly, they are denied.

error, the Defendant has the burden to establish the presence of the following five factors: (1) the record clearly establishes what occurred in the trial court; (2) a clear and unequivocal rule of law was breached; (3) a substantial right of the accused was adversely affected; (4) the issue was not waived for tactical reasons; and (5) consideration of the error is necessary to do substantial justice. State v. Vance, 596 S.W.3d 229, 254 (Tenn. 2020) (citations omitted). “Moreover, the error must have been of ‘sufficient magnitude that it probably changed the outcome of the trial.’” Id. (quoting State v. Banks, 271 S.W.3d 90, 119 (Tenn. 2008)).

In his reply brief, the Defendant disputes the State’s contention that he waived the issue for tactical reasons, asserting that he is hard of hearing, a fact that he mentioned several times throughout the trial, and that he simply failed to hear the judge’s disclosure that he and former federal magistrate John Bryant had both been members together of Woodmont Baptist at one point in time. Regardless, the Defendant cannot show that a clear and unequivocal rule of law was breached, that any substantial right of his was adversely affected, or that consideration of the error is necessary to do substantial justice.

“A judge shall disqualify himself or herself in any proceeding in which the judge’s impartiality might reasonably be questioned.” Tenn. Sup. Ct. R.10, RJC 2.11 (A). “Bases for which a judge’s impartiality might reasonably be questioned include . . . when the judge has ‘a personal bias or prejudice’ against any of the parties, ‘personal knowledge of facts that are in dispute in the proceeding’ [or] ‘has served as a lawyer in the matter in controversy, or was associated with a lawyer who participated substantially as a lawyer in the matter during such association[.]’” State v. Clark, 610 S.W.3d 739, 744 (Tenn. 2020) (quoting Tenn. Sup. Ct. R. 10, RJC 2.11 (A)(1),(A)(6)). “[T]he test for recusal requires a judge to disqualify himself or herself in any proceeding in which a person of ordinary prudence in the judge’s position, knowing all of the facts known to the judge, would find a reasonable basis for questioning the judge’s impartiality.” Id. (internal quotations and citation omitted).

The Defendant has failed to show any reason that the judge’s impartiality could reasonably be questioned. The judge himself brought up the fact he and the magistrate were at one point in time members of the same Baptist church after the Defendant elicited from the magistrate that he began attending the Church in September 2007 after many years spent at Woodmont Baptist Church. There was absolutely nothing to indicate that their membership together in the same church rendered the judge partial. There is also nothing in the record to show that either the trial judge or the probation revocation judge was in any way influenced by, or even acquainted with, Mr. Robinson. As for the trial judge’s uncle and father, the trial judge noted in his order of recusal that he had no knowledge of his uncle’s membership at Covenant. The Defendant does not explain why the employment of the judge’s father or uncle as police officers, if that is indeed the case, rendered the judge

impartial, other than that it is the Defendant's belief that the police and the district attorney and other governmental entities are part of a vast conspiracy to silence him. We note that the trial judge was lenient with the pro se Defendant, allowing him far more latitude than would be afforded a licensed attorney to present what was, at best, only marginally relevant evidence relating to his dispute with the Church. The Defendant is not entitled to relief on the basis of this issue.

CONCLUSION

Based on the foregoing authorities and reasoning, we affirm the judgment of the trial court.

ALAN E. GLENN, JUDGE