IN THE TENNESSEE SUPREME COURT AT NASHVILLE

FILED

NOV 18 2021

Clerk of the Appellate Courts

Willie Austin Davis

Defendant/Appellant

VS.

Case No. M2019-01852-SC-R11-CO

Trial No. 2017-A-62

State of Tennessee

Plaintiff/Appellee

AMENDED MOTION TO CONSIDER POST-JUDGMENT FACTS

- 1. Pursuant to Tennessee Rule of Appellate Procedure 14(a), Appellant moves the Honorable Court to consider the facts hereinafter set forth. For grounds, Appellant states these facts occurred after the judgment herein appealed. Pros Se Appellant made a few honest errors in a rushed motion filed with the Appellate Court Clerk's Office on Nov. 16, 2021, and an amended/corrected motion is filed today, Nov. 18, 2021. This action is taken in case the Tennessee Court of Criminal Appeals fail to provide the original motion to the Tennessee Supreme Court, or fail to take the appropriate action under the governing guidelines of the Tennessee Board of Judicial Conduct provided in the motion.
- 2. On Oct 6, 2020, Appellant provided Judge Alan E. Glenn and the Tennessee Criminal Appellate Court a 3rd Motion To Consider Post-Judgment Facts which included significant information about Trial Juror #5, Andrew McDonald, who lived on *Bresslyn Road* where child-molester John Perry lived, along with other Covenant Presbyterian church members:

Dr. Lee Bryant (MBA parent and friend of Attorney Worrick Robinson), Maury Bull, Roy and Edna Pearson, Don and Nancy Wilkes, Barry and Beth Gammons (Harpeth Hall parents with Barry serving as Covenant Collections Attorney), and former Covenant Presbyterian and Christ Presbyterian Pastor Jack Foster, who is now affiliated with West End Community Church and Uprise Nashville. See 3rd Motion To Consider Post-Judgment Facts (Appellate Record)

- 3. On June 29, 2021, Judge Alan E. Glenn, a graduate of Montgomery Bell Academy (MBA), denied all eight post-judgment motions in his appellate opinion filed two days prior to his retirement on July 1, 2021. (Note: Montgomery Bell Academy Headmaster Brad Gioia provided untrue sworn testimony against the Appellant before Judge Cheryl Blackburn during a post-conviction hearing on April 6, 2018, which is included via a court transcript in the Appellate Record now checked out by the Tennessee Supreme Court).
- 4. Appellant is now filing this new motion and a sworn affidavit with newly uncovered information about contaminated Trial Juror #5, Andrew McDonald, son-in-law of Attorney Joe Lackey, Jr., a Harpeth Hall community father. Exhibit 1 Exhibit 2
- 5. The new information was discovered during a recent eight day period from Nov. 7, 2021, through Nov 15, 2021, after the Appellant uncovered the existence of a new child-molester father, Ken Raetz, within the Christ Presbyterian Academy (CPA) community. Appellant discovered this information on Nov 7, 2021, three days after the unexpected passing of Judge Alan E. Glenn on Nov. 4, 2021. Exhibit 3
- 6. In researching information on a new child-molester father within the CPA community, Appellant discovered new information about Trial Juror #5, Andrew McDonald, a shareholder in Lattimore, Black, Morgan, and Cain (LBMC), and Andrew McDonald's

- wife, Attorney Brenner Lackey McDonald, a Harpeth Hall graduate, and a Facebook friend of Judge Steve Dozier's 2014 campaign fund-raiser co-chair, Attorney Worrick Robinson. Exhibit 2 Exhibit 3
- 7. Attorney Brenner Lackey McDonald's father is attorney Joeseph L. Lackey, Jr. (Joe), who was the former attorney for the Appellant's mother-in-law, Mrs. Nancy Skelton Fleming, a long time family friend of Sen. Albert and Mrs, Pauline Gore. Mrs. Nancy Fleming was a loving, devoted grandmother who passed away on Nov. 14, 2016, about 10 months before Attorney Joe Lackey's son-in-law, Andrew McDonald, voted to convict the Appellant during a Mann Act Federal crime cover-up to protect CPA father child-molester, John Perry, co-author with former GOP Presidential Candidate Mike Huckabee, former GOP Alabama U.S. Senate Roy Moore, Rev. Franklin Graham, and possibly President Donald J. Trump's first impeachment attorney, Jay Sekulow. To date, Nancy Fleming remains banned and defamed by the leaders of Covenant Presbyterian Church who have no shame or remorse for their inexcusable actions. Exhibit 2
- 8. In retrospect, four years after the Appellant's trial, the presence of Joe Lackey's son-in-law on the Appellant's trial jury should be of great concern to any honest Tennessee judge or attorney with a high ethical standard because Attorney Joe Lackey, Jr., made a significant legal decision during the final weeks of the life of Mrs. Nancy Fleming, which is still adversely affecting Mrs. Fleming's daughter, Catherine Fleming Davis, and her two grandchildren, Daisy and Drew Davis. Exhibit 2
- 9. On Sept 10, 2016, about two months before Mrs. Nancy Fleming passed away, Harpeth Hall Alumnae Relations Director, Scottie Coombs, signed a letter sent to Harpeth Hall Alumnae to undermine and disparage the Appellant's daughter who was brave to provide

- information to the Harpeth Hall community about the John Perry child sex abuse cover-up taking place at Covenant Presbyterian Church and The Harpeth Hall School. Exhibit 2
- 10. Harpeth Hall Alumnae Director Scottie Coombs signed the disparaging letter sent on Sept 10, 2016, while Scottie Coombs was still a member of a secret grand jury session which wrongfully indicted the Appellant under the legal authority and supervision of presiding grand jury judge, Steve Dozier, who also served as the Appellant's trial judge. To date, Judge Steve Dozier has never disclosed to the Appellant that Harpeth Hall father and Attorney Worrick Robinson was a long-time friend and his campaign fundraiser co-chair during the Davidson County judicial campaign of 2014. Exhibit 2
- 11. The disparaging Harpeth Hall letter was presumably sent to Harpeth Hall Alumna Brenner Lackey McDonald, along with thousands of other Harpeth Hall Alumnae all over the United States, about 10 months before Joe Lackey's son-in-law, Andrew McDonald, voted to wrongfully convict the Appellant of being a danger and threat to elementary school children at The Covenant School located in Burton Hills. Exhibit 2
- 12. The Harpeth Hall letter (one of two letters sent) was an additional abusive action extended towards the former Harpeth Hall student, Daisy Davis, who had been bullied out of The Harpeth Hall School to protect the child-molester, John Perry, a true threat and danger to little children in Tennessee, and beyond Tennessee. Exhibit 2
- 13. As a result of the 1st Harpeth Hall letter sent to HH Alumnae, Harpeth Hall grandmother, Nancy Fleming, was very upset about the additional bullying, harassment and abuse of her teen-age granddaughter, and she was very concerned about the future welfare of her daughter, Harpeth Hall Alumna, Catherine Fleming Davis, and her two grandchildren,

- Daisy and Drew Davis, as the institutional hatred and abuse of her family members intensified and grew meaner. Exhibit 2
- 14. To protect her daughter and grandchildren, Ms. Fleming wanted Catherine Fleming Davis to inherit her family home and she instructed Andrew McDonald's father-in-law, Attorney Joe Lackey, Jr., to execute a change to her final will. Exhibit 2
- 15. To ensure Nancy Fleming was competent to make a decision, Attorney Joe Lackey, Jr., requested for Dr. Edwin B. Anderson to go to Mrs. Fleming's home to examine Mrs. Fleming, and Dr. Anderson concluded that Mrs. Fleming was competent to make business and financial decisions. Exhibit 2
- 16. For reasons only known apparently to Attorney Joe Lackey, Jr., Mr. Lackey did not make the changes to Nancy Fleming's will and he withdrew as her attorney and sent her a bill about 7 days before she passed away on Nov 14, 2016. Exhibit 2
- 17. With the passage of four years time, including 18 days in jail following the Appellant's 2nd retaliation arrest prior to the Brentwood Academy vs, MBA football game on Oct 20, 2017, the Appellant is now very alarmed to discover that the son-in-law of Attorney Joe Lackey, Jr., Andrew McDonald, was a member of the Appellant's trial jury that convicted the Appellant during the John Perry child sex abuse cover-up which is now on-going before the Tennessee Supreme Court. Exhibit 2
- 18. The State of Tennessee, via the awesome power of the Nashville Police Department, ex-Judge Casey Moreland, Judge Steve Dozier, Judge Cheryl Blackburn, DA Glenn Funk's Office, Judge Alan E. Glenn, the Tennessee Court of Criminal Appeals, and Attorney General Herbert Slatery, have been united and determined in defending the malicious prosecution of the Appellant during the same period of time when CPA father, Ken Raetz,

was molesting an 11-13 year old child approximately 10-15 times, and during the same period of time when CPA father, John Perry, was given a free pass for molesting an 11-13 year old child approximately 25 times, and during the same period of time when Gracie Solomon alleges she was raped in an Asheville, North Carolina hotel room when she was 11-years old prior to the alleged murder of her older brother, Grant Solomon. Exhibit 3

- 19. Andrew McDonald, as a citizen juror who took a sworn oath, should have voluntarily disqualified himself from the Appellant's jury to ensure that the Appellant received a fair, impartial trial, especially since the Appellant's banned and abused daughter was courageous to provide sworn testimony about her cruel, relentless, bullying experience at The Harpeth Hall School, which includes Harpeth Hall Alumnae Relations Director Scottie Coombs, who later served on a secret contaminated grand jury that indicted the Appellant the first time, and who is a long-time friend of Harpeth Hall Alumna, Amy Grant, and possibly Andrew McDonald's wife, Harpeth Hall Alumna, Brenner Lackey McDonald. Exhibit 2
- 20. Just as Appellant was very troubled and disappointed to learn about secret grand juror Scottie Coombs, and secret grand juror, Davidson County Sheriff Sgt. Solomon Holley who was paid to participate in the Appellant's first retaliation arrest at Covenant Presbyterian Church, Appellant is now very troubled and disappointed to learn that Attorney Joe Lackey's son-in-law, Andrew McDonald, served on the Appellant's jury trial that wrongfully voted to convict the innocent Appellant. Exhibit 2
- 21. Appellant is also very troubled and disturbed to learn that Trial Juror #5, Andrew McDonald, is a Facebook friend with prominent Franklin businessman, Sam Johnson, a

- loyal friend of ex-Grace Chapel Pastor Steve Berger, and accused rapist and murderer, former WSMV TV news anchor, Aaron Solomon. Exhibit 2
- 22. Appellant has already provided information to the Honorable Court about WSMV TV Attorney Robb Harvey (a MBA father), and WSMV TV news anchor, Demetria Kalodimos, and a spider web of at least four alleged child sex abuse cover-up cases connected to Brentwood Attorney Larry Crain, the attorney for Grace Chapel who also represents, or represented, child-molester John Perry in a \$3 million Federal lawsuit against Rev.Billy Graham's publisher, HarperCollins. Exhibit 2
- 23. On. Nov. 10, 2021, a small group of child sex abuse advocates known as Grant's Army gathered for a candlelight vigil in front of the Tennessee State Capitol to pray for all elected public servants in all three branches of Tennessee Government, including the four remaining justices of the Tennessee Supreme Court. The Tennessee Supreme Court has been provided information on a spider web of alleged child sex abuse which includes information about the alleged child sex abuse of 11-year-old Gracie Solomon, and the alleged murder/cover-up of 18-year-old GCA baseball player, Grant Solomon, allegedly committed by former WSMV TV news anchor, Aaron Solomon. (Note: Amy Grant's husband, Vince Gill, is a long-time friend of Aaron Solomon who performed a song dedicated to Gracie Solomon at Grant Solomon's Celebration of Life Service at Grace Chapel where Gov. Bill Lee and Michael W. Smith also attend church.) Exhibit 2
- 24. Accordingly, Appellant respectfully makes an urgent request for the Court to grant this motion to consider these pertinent facts, in relation to and in the context of the memorandum of law (attached hereto and incorporated by reference), exhibits (attached

hereto and incorporated by reference), and sworn affidavit (attached hereto and incorporated by reference) in such a manner as the Court shall deem fair.

25. In support hereof, Appellant submits the sworn affidavit of Austin Davis, a memorandum of law in accordance of Rule 14(b) and Rule 22(a) of the Tennessee Rules of Appellate Procedure, and supporting background exhibits, all of which are incorporated herein by reference.

Respectfully Submitted,

Willie Austin Davis P. O. Box 159153

Nashville, TN 37215

615-999-8190 fmdshiloh@aol.com

CERTIFICATE OF SERVICE

I, Willie Austin Davis, hereby certify that a true and exact copy of the foregoing motion has been forwarded by United States Postal Service, first class, postage pre-paid, on Nov 18, 2021, to the following parties:

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

Willie Austin Davis P.O. Box 159153

Nashville, TN 37215

Willis auto

615-999-8190 fmdshiloh@aol.com

Memorandum of Points and Authorities Introduction

Appellant brings this motion pursuant to Tenn. R. App. P. 14 to provide the court new information about Trial Juror #5, Andrew McDonald, a contaminated juror on the Appellant's trial jury. Appellant contends that the Appellant's trial jury was contaminated by Trial Juror #5, Andrew McDonald, son-in-law of Attorney Joe Lackey, Jr., resulting in a prejudiced, unfair conviction of the Appellant. Exhibit 2.

Background

The Tennessee Constitution and Tennessee Judicial System are founded upon the legal precept of an accused Defendant receiving a "fair, impartial" trial with the 6th Amendment freedom to vigorously defend himself in the United States of America. During the Appellant's trial which began on the patriotic 16th anniversary of the World Trade Towers – Pentagon attack, Judge Steve Dozier repeatedly told the potential jurors, the Appellant, and those in the courtroom, that the Defendant-Appellant was presumed innocent and deserved a "fair, impartial trial" according to the law. 5 Exhibits – Motion For New Trial Hearing – 1 of 4 – Transcript of Jury Selection – Pgs 1 – 130

After Trial Juror #5, Andrew McDonald, was selected and seated with the other eleven jurors, and the replacement juror, for the Appellant's prejudiced and contaminated trial, Judge Steve Dozier reassured the Appellant that no one was going to mistreat the Appellant in his courtroom: "Nobody is going to mistreat you in here in any way from my perspective." 5 Exhibits – Motion For New Trial Hearing – 2 of 4 – Transcript of Trial – Vol 1 – Pg 17-19.

Judge Steve Dozier reassured the Appellant that his court was seeking a "fair, impartial" trial, but Trial Juror #5, Andrew McDonald, remained on the jury throughout the entire trial and

during the sworn testimony of bullied former Harpeth Hall student, Daisy Davis, and Harpeth Hall graduate, Catherine Fleming Davis, without ever disclosing to the Appellant that his father-in-law was Harpeth Hall father Joe Lackey, Jr., the former attorney for the Appellant's mother-in-law, or that his wife was Harpeth Hall Alumna Brenner Lackey McDonald, a possible friend of Harpeth Hall Alumnae Director and secret grand juror, Scottie Coombs. Exhibit 2.

As a result of uncovering this new information about Andrew McDonald (Trial Juror #5), Appellant argues he did not receive a fair, impartial trial as promised by the Tennessee Constitution and the U.S. Constitution, and the Appellant prays this motion will be granted to protect the integrity of the Tennessee Judicial System, and to protect little children from child-molesters and sexual predators.

<u>Standard</u>

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

presented in such a manner and pursuant to such reasonable notice and opportunity to be heard as it deems fair." Tenn. R. App. P. 14(c)

I. The Presence of Contaminated Juror #5, Andrew McDonald, Merits Review For Substantial Justice

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

The undisputed facts show that Trial Juror #5, Andrew McDonald, son-in-law of Attorney Joe Lackey, Jr., and husband of Harpeth Hall Alumna and Attorney Brenner Lackey McDonald, was not forthcoming with extremely important information during the jury selection, trial and deliberation process, and the verdict of the jury is now revealed as contaminated by Trial Juror #5, Andrew McDonald. Exhibit 2.

Conclusion

For the reasoning stated above, it is appropriate and the high ethical duty of the Honorable Curt to consider the post-judgment facts provided to the Honorable Court about Trial Juror #5, Andrew McDonald, in pursuit of "substantial justice" for a falsely accused, falsely arrested, falsely indicted, falsely prosecuted, falsely convicted, falsely sentenced, and falsely jailed Appellant. The Appellant prays the Honorable Court will exercise sua sponte, or nostra sponte authority, to vacate the guilty judgment against the Appellant since the Appellant's 6th Amendment constitutional right was violated by Judge Steve Dozier, and possibly by Juror Andrew McDonald, son-in-law of Attorney Joe Lackey, Jr., who lived or still lives on the same "Bresslyn Road" as protected child-molester John Perry, and numerous leaders and members of Covenant Presbyterian Church. Exhibit 2. 3rd Motion To Consider Post-Judgment Facts (Appellate Record)

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

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

Rule 2.15 B of the Tennessee Code of Judicial Conduct – Rule 10 states: "A judge having

knowledge that a lawyer has committed a violation of the Rules of Professional Conduct that raises

a substantial question regarding the lawyer's honesty, trustworthiness, or fitness as a lawyer in

other respects shall inform the appropriate authority."

Rule 2.15 C of the Tennessee Code of Judicial Conduct – Rule 10 states: "A judge who

receives information indicating a substantial likelihood that another judge has committed a

violation of this Code shall take appropriate action."

Rule 2.15 D of the Tennessee Code of Judicial Conduct - Rule 10 states: "A judge who

receives information indicating a substantial likelihood that another lawyer has committed a

violation of the Rules of Professional Conduct shall take appropriate action."

Respectfully Submitted,

Willie Austin Davis,

P.O. Box 159153

Nashville, TN 37215

615-999-8190 fmdshiloh@aol.com

Willie Late Vos

IN THE TENNESSEE SUPREME COURT AT NASHVILLE

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Defendant/Appellant

VS.

Case No. M2019-01852-SC-R11-CO **Trial No.** 2017-A-62

State of Tennessee

Plaintiff/Appellee

AFFIDAVIT OF WILLIE AUSTIN DAVIS

In support of the forgoing motion to consider post-judgment facts, I, Willie Austin Davis, attest that the following testimony is true and accurate and, under penalty of perjury, state as follows:

- 1. I am a 66-year-old resident of the State of Tennessee, am competent to provide the testimony stated herein, and make this testimony based on personal knowledge.
- 2. I am not filing the motion to consider post-judgment facts for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.
- 3. I am a whistleblower on at least four alleged child sex abuse cover-up cases connected to Brentwood Attorney Larry Crain: 1). The John Perry Covenant Presbyterian Church –cover-up case; 2) The alleged gang rape of a 6th grade student at Brentwood Academy; 3) The rape of a 3-year-old child, and the alleged sexual assault of a 2nd 3-year-old child, at Fellowship Bible Church; 4) The alleged child sex abuse of 11-year-old Gracie Solomon, and the alleged murder of Gracie Solomon's brother, Grant Solomon, to cover-up the alleged child sex abuse.
- 4. I have provided a sworn affidavit about all the exhibits which are included with the amended motion to consider post-judgment facts. My sworn affidavit is included with the other exhibits as Exhibit 1.
- 5. Between Nov. 7, 2021 through Nov 16, 2021, I personally discovered new post-trial, information, revisited older pre-trial and post-trial information, and printed off the material included in Exhibit 2. The information related to Attorney Joe Lackey, Jr. and Nancy Skelton Fleming occurred prior to my trial, but the significance of information is important now that

Trial Juror # 5 has been uncovered as the son-in-law of Attorney Joe Lackey, Jr. The secret grand jury information occurred prior to my trial, but I did not learn about the secret grand juries until after my trial, conviction, and sentencing. The HH letters were sent prior to my trial, but the significance of the Harpeth Hall letters are important now with post-trial information learned about Harpeth Hall Alumnae Relations Director Scottie Coombs, and Harpeth Hall Alumna Brenner Lackey McDonald, wife of my Trial Juror #5, Andrew McDonald. Exhibit 2 includes: 1) New Post-Trial Information about Trial Juror #5, Andrew McDonald, who is married to Harpeth Hall graduate and Attorney Brenner Lackey McDonald, a Facebook friend with Harpeth Hall parent and Attorney Worrick Robinson; 2) New Post-Trial Information about Attorney Brenner Lacey McDonald, who is the daughter of Attorney Joseph L. Lackey, Jr. who was an attorney for my mother-in-law, Nancy Skelton Fleming; 3) Old Pre-Trial information about Nancy Skelton Fleming, including medical and attorney documents, and also including a photo taken at the Gore Farm after the 2000 Presidential Election; 4) Old Pre-Trial information about Harpeth Hall Alumnae Relations Director Scottie Coombs, including a grand jury report and two Harpeth Hall letters signed by Scottie Coombs; 5) Old Post-Trial information about Rev. Billy Graham's biography, child-molester John Perry, and Attorney Larry Crain; 6) New Post-Trial information about Juror #5, Andrew McDonald, Sam Johnson, Steve Berger, Aaron Solomon, and Grant Solomon; 7) Old Post-Trial information about Judge Cheryl Blackburn and Davidson County Sheriff Sgt. Solomon Holley, a secret grand juror who was paid to participate in my retaliation arrest at Covenant Presbyterian Church. The combination and totality of all obtained information is now enlightened with a new perspective as the total information is connected and provided with the amended motion to consider post-judgment facts as Exhibit 2.

6. Between Nov. 7, 2021 through Nov 16, 2021, I personally uncovered information about a new child-molester father within the Christ Presbyterian Academy community named, Ken Raetz. I also personally discovered information about his work history and the sale of his company, Think Data Insights, to Lattimore, Black, Morgan, and Cain (LBMC). During my research, I also personally uncovered employment history information about my Trial Juror #5, Andrew McDonald, while searching for additional information about CPA child-molester father, Ken Raetz. I learned from the search that Trial Juror #5, Andrew McDonald, and new child-molester CPA father, Ken Raetz, have both been employed by Lattimore, Black, Morgan and Cain which is headquartered in Brentwood, Tennessee. I also confirmed that Ken Raetz had at least one child at Christ Presbyterian Academy. Also, I am including information about the Fellowship Bible Rape Case, Christ Presbyterian Church, and The Middle Tennessee Boy Scouts Executive Board, which was provided to the Tennessee Courts of Criminal Appeals (with a few new comments added). This newly obtained information is provided with the amended motion to consider post-judgment facts as Exhibit 3.

I declare under penalty of perjury that the foregoing is true and correct. Executed by me this 18th day of November, 2021.

FURTHER THIS AFFIANT SAYETH NOT.

Willie Austin Davis

STATE OF TENNESSEE) COUNTY OF DAVIDSON)

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

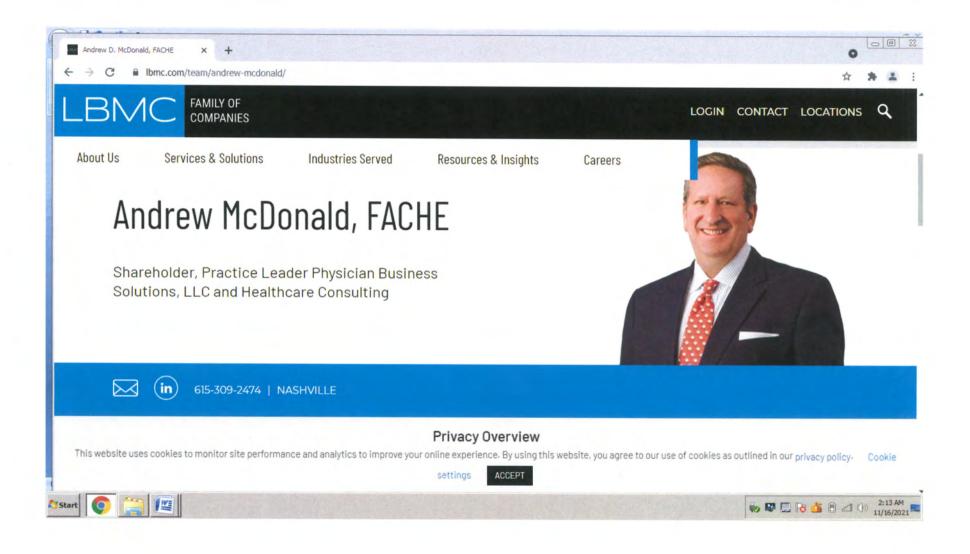
Sworn to and subscribed before me this _________________

_day of November, 2021.

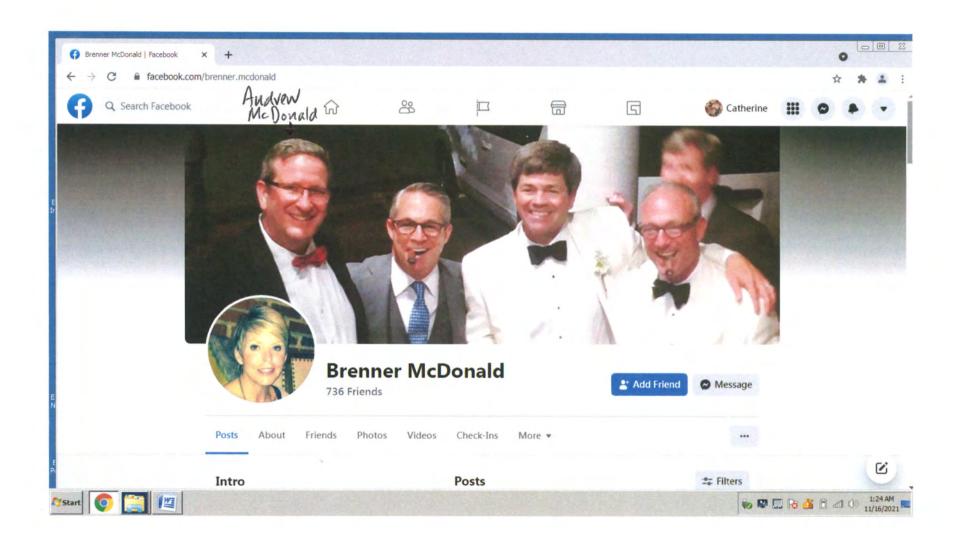
Notary Public

My commission expires: $\frac{10/2}{2023}$

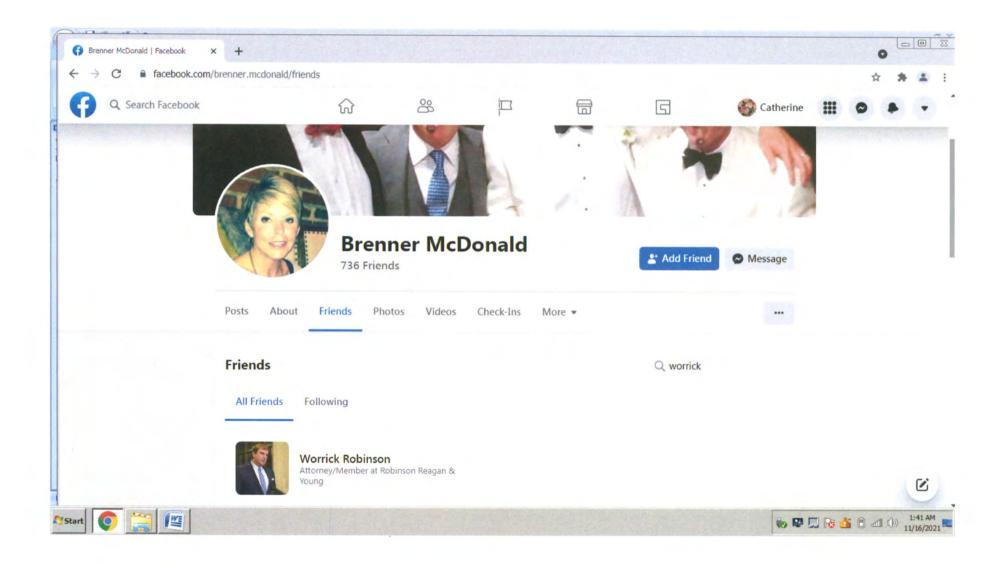
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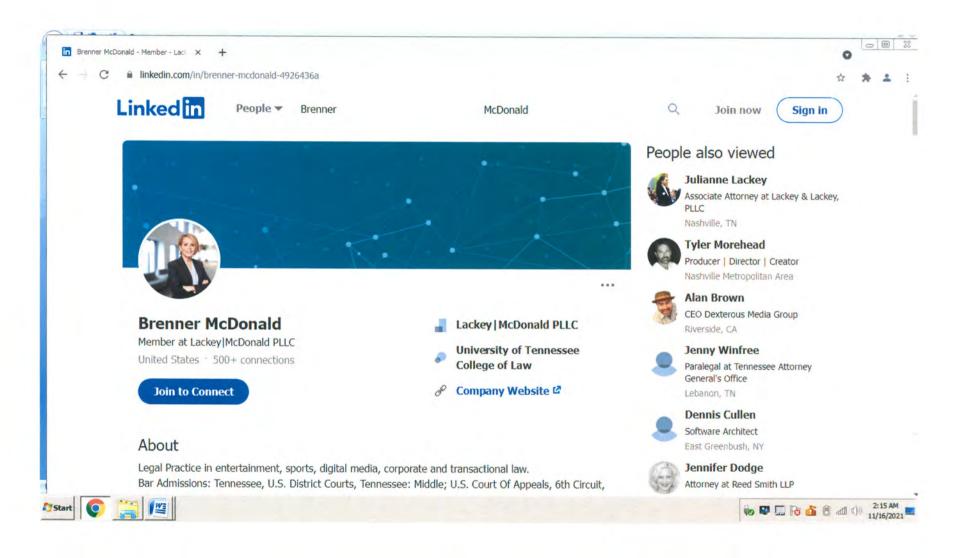


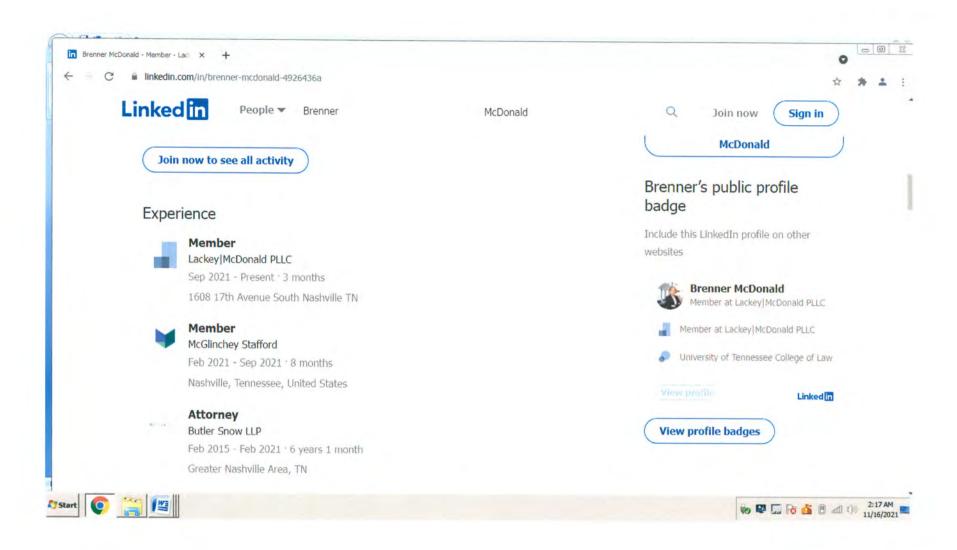


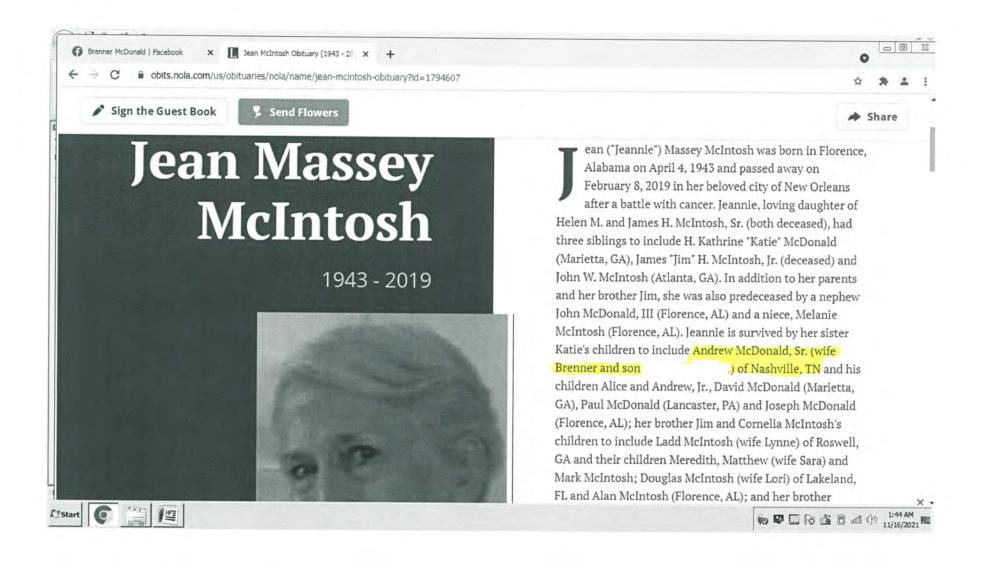


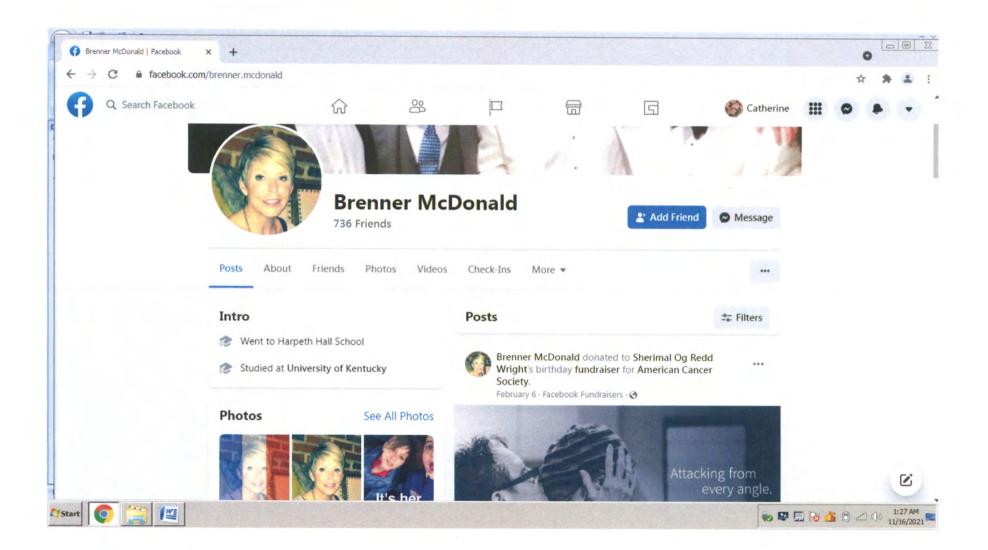




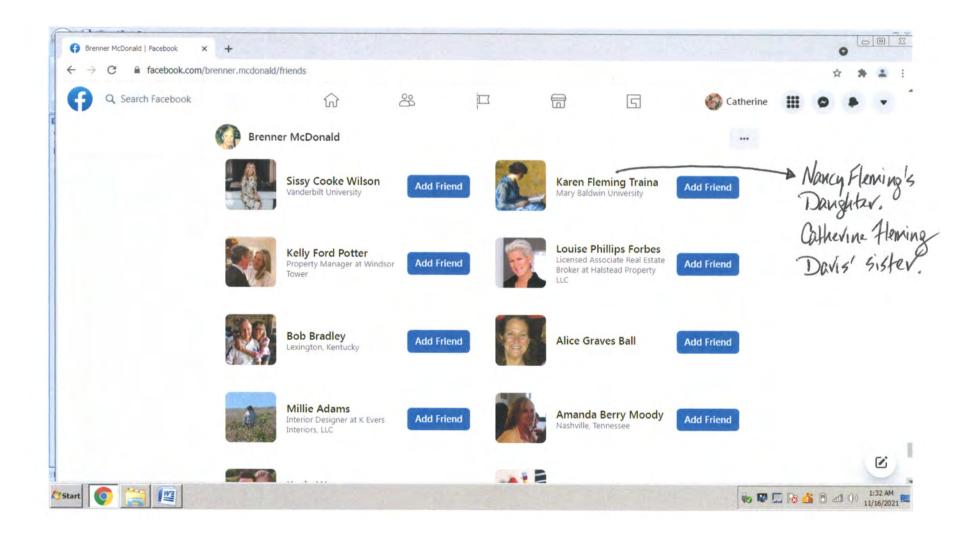














Nancy Skelton Fleming - Still banned and defamed by Covenant Presbyterian Church Leaders.

Nashville, TN

Nancy Skelton Fleming, 81, passed away Monday, November 14, 2016, at her home in Nashville, TN.

Nancy was born on September 17, 1935, in Charleston, S.C., to Edwin Polk and Daisy Womble Skelton. Nancy was a Vanderbilt graduate ('57) and past president of the Women's Medical Auxiliary. Nancy was active with the Sow n Grow Garden Club and served with her friends in many roles over the years. Nancy loved Jesus and Psalm 24 imbued her with strength.

Nancy is survived by her children: Janetta Fleming of Nashville, Catherine (Austin) Davis of Nashville and Karen (Bill) Traina of Wrightsville Beach, N.C.; grandchildren: Anna (Jason) Tuell, Isabel Concepcion & Daisy and Drew Davis. She was preceded in death by her parents, exhusband, Dr. James Fleming and grandson, Nicholas Concepcion.

A private graveside service was held at Polk Memorial Gardens, Columbia, TN, Fri., November 18.

In lieu of flowers, contributions may be made to the Nicholas Fleming Concepcion memorial at Montgomery Bell Academy.

Online condolences may be made to the family at the Williams Funeral home website www.williamsfh.com



Appellant

LAW OFFICE JOSEPH L. LACKEY, JR. 40 BURTON HILLS BLVD., SUITE 200

NASHVILLE, TN 37215

JOSEPH L. LACKEY, SR. (1903-1986)

TELEPHONE (615) 386-7185 FACSIMILE (615) 297-6005

November 7, 2016

Ms. Nancy Fleming 19 Red Bud Nashville, TN 37215

Dear Nancy,

This will confirm your telephone call to me on November 5, 2016 during which you advised me that you want to leave your Will "as is" and asking me not to call anyone about your decision. I told you that I understood.

Enclosed is my statement for telephone calls, review of file, trip to your house, letter to Dr. Anderson and preparation of draft changes to your Will before you advised me not to go forward with any changes.

Thank you for the confidence you placed in me over the last two weeks.

Yours very truly,

Joseph L. Lackey, Jr.

P.S.

I received your video sent to me on November 7th at 10:26 A.M. telling me "Joe, I want you to change my Will, thank you." This is the fifth (5th) time you have changed your mind on this matter in recent weeks. I am concerned and feel that you are unsure about what you really want to do concerning your Will. Accordingly, I would like you to hire another attorney to carry out your wishes in this regard.

(I had dictated the original body of this letter, setting out our conversation of Saturday, November 5th during which you told me not to make any changes and not to call anyone, before I added this postscript.)

JLLjr/cak Enclosure

JOSEPH L. LACKEY, JR.

40 Burton Hills Blvd., Suite 200 Nashville, TN 37215

JOSEPH L. LACKEY, SR. (1903-1986)

TELEPHONE (615) 386-7185 FACSIMILE (615) 297-6005

November 7, 2016

Ms. Nancy Fleming 19 Red Bud Nashville, TN 37215

| STATEMENT | | | | | | | |
|------------------------------------|--------------|----------|--|--|--|--|--|
| FOR PROFESSIONAL SERVICES RENDERED | | \$625.00 | | | | | |
| | BALANCE DUE: | \$625.00 | | | | | |

Yours truly,

Joseph L. Lackey, Jr.

JLLjr/cak

LAW OFFICE JOSEPH L. LACKEY, JR. 40 BURTON HILLS BLVD., SUITE 200 NASHVILLE, TN 37215

JOSEPH L. LACKEY, SR. (1903-1986) TELEPHONE (615) 386-7185 FACSIMILE (615) 297-6005

October 27, 2016

Dr. Edwin Anderson 4230 Harding Road, Suite 650-E Nashville, TN 37205

RE: Nancy S. Fleming

Dear Dr. Anderson:

Enclosed is a Medical Records Release Authorization signed by Ms. Fleming.

I prepared a Will for Ms. Fleming on January 6, 2016 and subsequently a Durable Power of Attorney and Power of Attorney for Healthcare.

Recently, Ms. Fleming has contacted me about making a change in her Will to the effect that she wants to leave her house to her daughter, Catherine Davis.

I know Ms. Fleming is in declining health because she did not want to come into my office on September 16, 2016 to sign the Powers of Attorney I had prepared for her but asked that we let her remain the Catherine Davis's car and have same notarized and witnessed. Ms. Fleming appeared to be in complete control of her mental faculties and we went over the documents and the Notary Public, Cynthia A. Hall, commented to me about how mentally alert Ms. Fleming appeared.

When Ms. Fleming called me about the change in her Will I told her that I needed to get an opinion from her doctor regarding her mental competency due to her health condition and that I would have to get her to sign an authorization form giving you permission to furnish information about her mental competency to which she agreed. On October 25, 2016, I went to Ms. Fleming's home and we talked pleasantries and then I went over the legal issues involved in changing a Will by a person in failing health and advanced years. She stated to me "I am mentally competent to make this change in my Will and I will sign the Medical Authorization Release Form".

I would request that you allow Ms. Fleming to make an appointment with you to come to her home so you can give your professional opinion as to her condition for purposes of executing a change in her Will.

Joseph L. Lackey, Jr. Jy Jr.

JL.L.jr/cok Enclosure

Ex2

To: 1615

From: 1615

Date: 10/27/16 Time: 2:25 PM Page: 05/08

MEDICAL RECORDS RELEASE AUTHORIZATION

Thereby anthorizo. Dr. Edwin Anderson.

Nashville, 14, 37205

and its physicians, employees and agents to release or disclose to the below-named person or organization all of my medical records including office notes, treatment notes, and/or test results concerning my physical and/or medical condition for the dates of gently, of 2016 to present,

Please release these records to the following:

JOHEPH L. LADKEY, JR.

NACHVILLE, TN 37215

Patient's Namo: Nancy 5. Fleming.
- Patient's SSN:

Patient's Date of Birth: 9/17/35

This Release concerns release of the records of Nancy 5, Flam ing

The purpose of this disclosure is for legal discovery.

This authorization will expire on the following date: Dacante 31, 2016

I understand that I may revoke the Authorization at my time prior to the expiration date or event, but that my revocation will not have any offect on actions taken by the above-named health care provider or its physicians, employees or agents before they received my revocation. Should I desire to revoke this Authorization, I must send written actics to the above-named health care provider.

I understand that I am required to sign this Authorization. The above-assed health care provider will not condition treatment, payment, enrollment, or eligibility for benefits on whether I provide this Authorization.

I understand that my records may be subject to disclosure by the recipitant and may no longer be protected by federal privacy regulations. I understand that this Authorization does not limit the above-named health care providers or its physicians, employees or agents' ability to use or disclose my information for treatment, payment, or health care operations, or as otherwise permitted by law.

Date: Qt 25, 2016

Nambolis of J. Flering

Ex2

#5016210 P. 1

* * Communication Result Report (Nov. 7. 2016 3:24PM) * * *

Date/Time: Nov. 7. 2016 3:22PM

File
No. Mode
Destination
Pg(s)
Result
Not Sent

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96152976005
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Reason for error
E. 1) Hang up or line fail
E. 2) No answer
E. 5) Exceeded max. E-mail size

E. 2) Busy E. 4) No lacsimile connection E. 6) Destination does not support 1P-Fax

ERITAGE MEDICAL ASSUCIATES, F.C.

St. Thornes Fex Confidential Information

To Apreal Cachery of
Dutac 11 7/1 b Those
Plant Remainer

The Remainer

From: Edwin B. Anderson, Jr. MD

Yes Neabor: (615) 936-3936 P

Phone (Combert (615) 222-2862

subject a sayon of he letter was maded to Mr. Flering.

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Harrings Mindless Associates M. Thomas-Couldertist in termstice 4330 Martin Essel Sells Mills Marketta, 716 Frant

Exz



St. Thomas Fax Confidential Information OCT "

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Confidentiality Notice:

This facsimile contains Confidential Protected Health Information that is legally privileged and protected. This information is intended only for the use of the individual or entity named as the Recipient above. If you are not the intended recipient of this information or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution, or action taken in reliance on the contents of these documents is strictly prohibited. If you have received this information in error, please immediately notify Heritage Medical Associates at the contact number above and arrange for the return or destruction of these documents.

Heritage Medical Associates- St. Thomas-Confidential Information 4230 Harding Road Suite 605E Nashville, TN 37205

Exz



4230 Harding Road Nashville, TN 37205 Phone: (615) 222-2862

Friday, October 28, 2016

Re: Nancy J Fleming DOB: 09/17/1935

To Whom It May Concern:

In my opinion Ms. Fleming is competent to make business and financial decisions. I would recommend that she be off opioid medications for at least 12 hours before making any such decisions or executing legal documents.

Sincerely,

Edwin B. Anderson, Jr., M.D., FACP

Friday, October 28, 2016

Page 1/1

ExV



4230 Harding Road Nashville, TN 37205 Phone: (615) 222-2862

Nancy J Fleming DOB: 09/17/1935 (81 years)

Encounter Date: 10/27/2016

History of Present Illness

The patient is a 81 year old female who presents with a complaint of Home visit. Seen at home with her daughter. Feels fairly well. Her only complaint is her chronic hip pain, but she states that she is getting good pain relief from her current meds per Alive Hospice. She is comfortable at present and her last dose was around 18 hours ago. Her daughter states that constipation has been a problem, and the hospice nurse is coming today to help with that.

She is alert, lucid, appropriate. Discussed her children and grandchildren. States that she is planning some changes in her will and understands them. Not discussed in detail. Voice no new problems.

History

There is no documented history at this time.

Vitals

Physical Exam

General

Alert, lucid, no acute distress

Assessment & Plan
Lung cancer metastatic to bone (162.9 | C34.90)
Today's Impression: .
Continue palliative care per Alive Hospice
Current Plans:

EB. alexany, ms, FADP

Edwin B Anderson JR MD

Electronically Signed on 10/28/2016

Nancy 3 Flerring

Patient #: 5016210

DOB: 09/17/1935 (81 years)

Page 1/1

Monday, November 7, 2016

&2



HH Alumnae Director Scottie Coombs provided HH Alumnae misleading information while Ms. Coombs was a secret member of a contaminated grand jury session that wrongfully indicted Austin Davis.



Scottie Coombs
Secret Grand Juror

Amy Grant

JAILED 18 DAYS



Austin Davis – Father of the former Harpeth Hall student further bullied and humiliated by the Sept 10 HH Alumnae letter.



Reese Witherspoon Scottie Coombs

From: "Harpeth Hall" alumnacoffice@harpethhall.org>Date: September 10, 2016 at 6:08:42 PM CDT

To

Subject: An Important Message from Harpeth Hall

Reply-To: coombs@harpethhall.org

September 10, 2016

Letter sent 41 days after the retaliation indictment.

Dear Harpeth Hall Alumnae,

Many of you recently received an unauthorized email from a former Harpeth Hall student email is an improper use of Harpeth Hall contact information and a clear violation of our Privacy Policy as stated on the alumnae portal of our website which states:

"The information in the Alumnae Directory may NOT be reproduced in any form or used fo commercial, nonprofit, or political solicitation purposes or mass communication not previous approved by the Alumnae Office. It is NOT to be copied or provided to anyone outside the Harpeth Hall community. Individuals violating the Privacy Policy will be removed from the directory and will not be permitted to have any future access to the directory."

Please know that the former student's email was in no way an approved communication by Harpeth Hall. No one at the school had any prior knowledge of the sender's intended unauthorized use of such information and would not have approved it had such request be made. Harpeth Hall takes every precaution to protect your contact information and strives communicate with you in an appropriate and professional manner.

Further, we wish to reassure you that the allegations in the former student's email are unsubstantiated. We anticipate sending you a more detailed report on the current state of matter in the near future, however, we wanted to send this more immediate response to reassure you that the former student's email was both improper and sent without Harpeth Hall's knowledge or consent.

We are most grateful for your loyalty to Harpeth Hall and regret any concern this unauthor email may have caused you.

Warm regards.

Appenie mera

Stephanie Balmer Head of School

feathe Countr

Scottie Fillebrown Coombs '78
Director of Alumnae Relations

Harpeth Hall Leadership accused a bullied former Harpeth Hall student of an "improper" action while HH Leadership protected a Mann Act Federal crime cover-up with NO statute of limitations for child sex abuse across state lines. On Feb 10, 2017, Harpeth Hall Leadership provided HH Alumnae "blocking" instructions so that thousands of HH Alumnae could also become active participants in an on-going Mann Act Federal crime coverup.

Ex



Contaminated secret grand juror Scottle Coombs provided Diocking instructions to Harpeth Hall Alumnae during a Mann Act Federal crime cover-up connected to Presidential Politics, Rev. Billy Graham's final biography, and the Ukraine.



Scottie Coombs Secret Grand Juror

Amy Grant



Catherine Fleming Davis '79



Reese Witherspoon **Scottie Coombs**

From: alumnaeoffice@harpethhall.org

Sent: 2/10/2017 6:19:51 P.M. Central Standard Time Subj: An Important Message from Harpeth Hall

February 10, 2017

Dear Harpeth Hall Alumnae,

We are aware that large groups of alumnae continue to receive unsolicited emails from the valglenn 18@aol email address belonging to Austin Davis. We deeply regret this repeated intrusion into your privacy. As background, alumnae contact information was acquired from the Harpeth Hall online alumnae directory through 1979 alumna Catherine Fleming Davis's account. Her access to our website and our online directory was terminated on September 9, 2016, as soon as we became aware of the Davis family's first mass email to our alumnae community and their violation of our privacy policy which is clearly stated on the alumnae portal of our website.

"The information in the Alumnae Directory may NOT be reproduced in any form or used for any commercial, nonprofit, or political solicitation purposes or mass communication not previously approved by the Alumnae Office. It is NOT to be copied or provided to anyone outside the Harpeth Hall community. Individuals violating the Privacy Policy will be removed from the directory and will not be permitted to have any future access to the directory."

As we communicated to you in September, the Davis family brought a suit against Harpeth Hall that was dismissed. The court's decision is final and unappealable.

Unfortunately, you may receive more unwanted emails from Austin Davis as he is still in possession of the alumnae email addresses acquired in September. He continues to violate our privacy policy with each mass email to our community. If you wish to block emails from the valglenn18@aol email address, you can mark the emails as spam or filter the emails so that they will not appear in your inbox.

Below are links to popular email providers with instructions on how to filter unwanted emails:

- Gmail https://support.google.com/mail/answer/6579?hl=en
- Comcast https://customer.xfinity.com/help-and-support/internet/spam-filters-and-emailblocking-new-experience?view=app
- Hotmail https://www.lifewire.com/set-up-incoming-mail-filter-hotmail-1174276
- iCloud https://support.apple.com/kb/ph2650?locale=en_US
- Yahoo https://help.yahoo.com/kb/SLN15994.html

Thank you for your support of and loyalty to Harpeth Hall. It remains our goal to protect our student and alumnae community. We work every day to uphold the highest standards of educational excellence and hear your frustration with this challenging situation.

Warm wishes.

Holianic (mira

Stephanie Balmer Head of School

Leathe Counds

Scottie Fillebrown Coombs '78 Director of Alumnae Relations



Was Harpeth Hall protecting students and alumnae or protecting a child sex abuse cover-up?



ill banned and bullied.

Do Amy Grant, Reese Witherspoon and the Harpeth Hall-MBA community support bullying, rigged grand juries and "private" child sex abuse?



Scottie Coombs Secret Grand Juror

Amy Grant



Reese Witherspoon

Scottie Coombs



Billy Graham Amy Grant

Grand Jury Final Report July Term 2016

Steve R. Dozier, Judge Criminal Court Division I Davidson County, TN

September 23, 2016

Grand Jury Members July - September Session 2016

Janifer aller Jenniter Allen

Sandia Carney

Sandra Carney

Rebecca Carey

Patty Kemp



Scottie Coombs

Judge Steve Dozier recused after the trial.



Don Dozier -Judge Dozier's Uncle -Ex-Covenant Member -Stephens Valley **Charter Member**

Mar 3-m

Matthew Martin

Sandra Phillips

Donald Wunder Wunder

Stan Fossick was foreman on both grand jury indictments.

Nashville ghostwriter sues Christian publisher over new Billy Graham biography

Holly Meyer - The Tennessean - May 2, 2018



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

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

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

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

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

Exx

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

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

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

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



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

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

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

"Allegations of sexual battery were substantiated" by investigators, Aaron said. Charges could not be filed because the statute of limitations had passed. False information The Tennessean and Gannett Corporation have refused to correct.

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

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

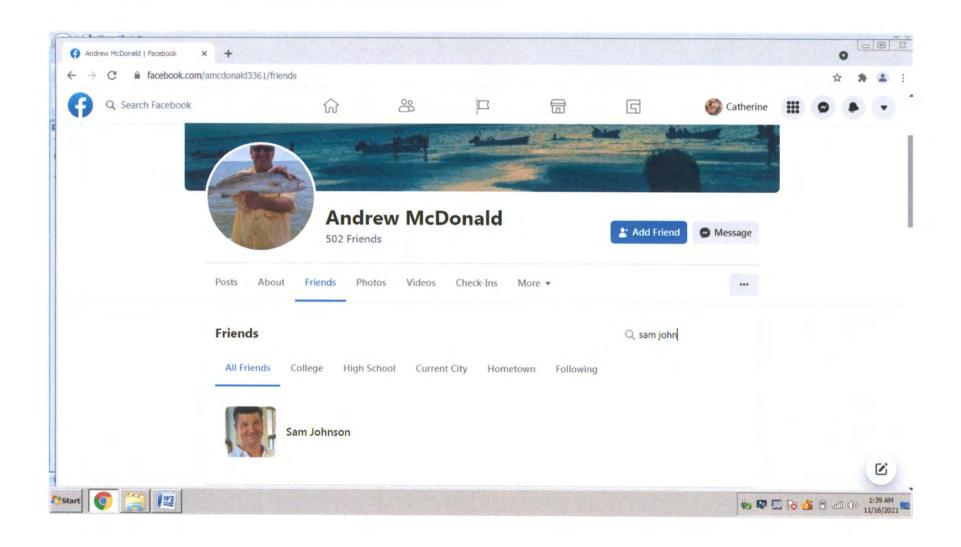
Billy Graham <u>died in February</u>. In the run-up to the book's release, Franklin Graham has been promoting "Through My Father's Eyes" online and in the national media.

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

"Through the years, Sam kept asking, 'Have you written that book yet? Don't wait too long,'" Franklin Graham said. "I've written about my father's journey and what I've learned through his eyes and what I've tried to put into practice." Sam Moore — Former Covenant Presbyterian Church Elder and long-time friend to Rev. Billy Graham and Rev. Franklin Graham.



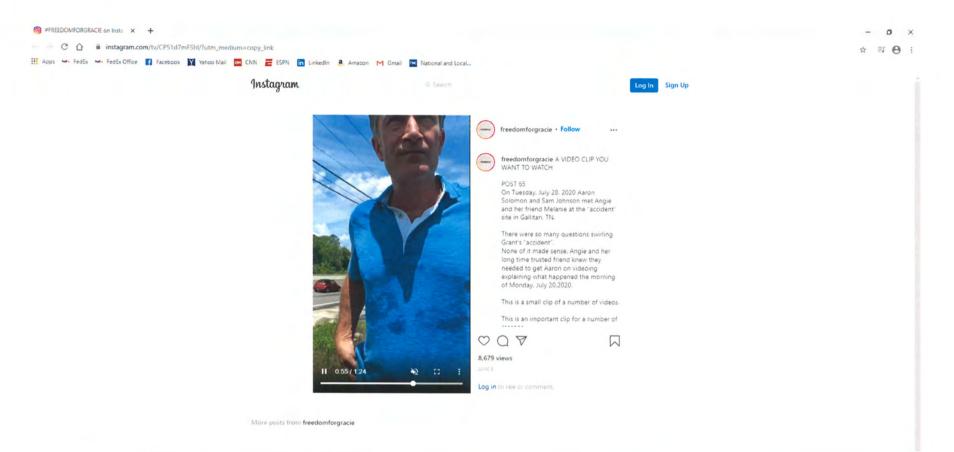
John Perry



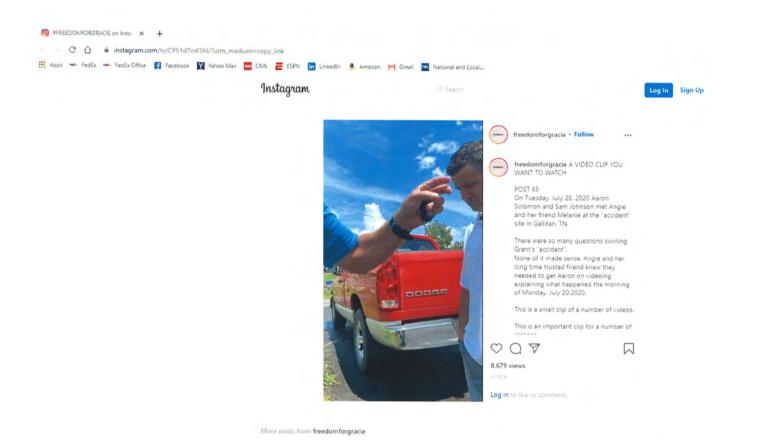


Steve Berger (far right) visiting Washington, D.C. with Sam Johnson (far left), among others.

Ex2



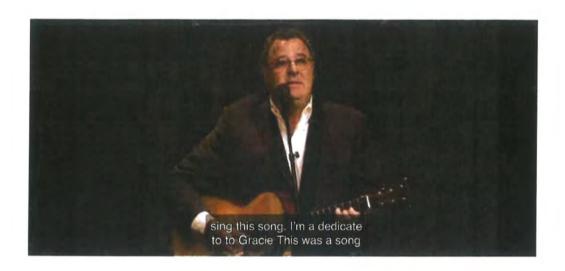




☆ ■ 0 :



<u>July 25, 2020</u>: Aaron Solomon's long-time friend, Vince Gill, was loving and compassionate to sing a song dedicated to Gracie Solomon during the "Celebration of Life Service."











To learn more about a 2nd alleged child sex abuse cover-up case connected to Amy Grant's high school, Harpeth Hall, visit The Silent Bell web site: https://www.thesilentbell.org/

SHOULD A DAVIDSON COUNTY SHERIFF SERGEANT WHO WAS <u>PAID</u> TO PARTICIPATE IN THE ARREST OF AUSTIN DAVIS ALSO BE ALLOWED TO SERVE ON A SECRET CONTAMINATED GRAND JURY THAT INDICTED AUSTIN DAVIS?

False Arrest Video - Nov 15, 2015:

Witness: "So you have the legal right to arrest him?"

DCSO Sgt. Solomon Holley: "Yes."



NOT LAW ENFORCEMENT?



SGT. SOLOMON HOLLEY DAVIDSON COUNTY SHERIFF'S DEPT.

BANNED



Covenant Presbyterian Church - Green Hills

GRAND JUROR'S OATH

"You as members of the grand jury do solemnly swear (or affirm) that you will diligently inquire, and true presentment make, of all offenses given you in charge, or otherwise brought to your knowledge, committed or triable within this county, that you will keep in secret the state's counsel, the other jurors' and your own; that you will present no person from hatred, malice, or ill will, nor leave any unpresented through fear, favor, or affection, or for any reward, or the promise or hope thereof, but that you will present the truth, the whole truth, and nothing but the truth, according to the best of your skill and understanding. So help you God.

RIGGED



Judge Cheryl Blackburn

Judge Cheryl Blackburn protected Judge Steve Dozier and her own hand-selected grand juror, Sgt. Solomon Holley, by denying a New Trial Motion requested by Austin Davis. Judge Cheryl Blackburn ruled that Davidson County Sheriff Officers are not part of "law enforcement." Question: Should Judge Blackburn disqualify a secret grand juror who was paid to participate in the arrest of Austin Davis who was wrongly indicted by the contaminated grand jury to protect an on-going Mann Act Federal crime cover-up?



Sgt. Solomon Holley

How many Nashville grand juries are rigged? Should DCSO Sgt. Solomon Holley, who was paid to participate in the arrest of Austin Davis, also serve on Judge Cheryl Blackburn's hand-picked grand jury which indicted Austin Davis?



Respectfully submitted on March 30, 2017, by the Davidson County Grand Jury, January - March 2017 term.

RIGGED?

Stan Fossick, Jury Foreperson

Red Flag Warning

Solomon Holley

DAVIDSON COUNTY SHERIFF OFFICER

Ronnie Rutledge

Anita Smikes

Shanrekia Ward



Does Davidson County Sheriff Daron Hall support the arrest and indictment of Austin Davis, and the arrest-grand jury work of DCSO Sgt. Solomon Holley?



Robert M. Pautienus III Attornev At Law

April 26, 2021

SENT VIA US MAIL AND EMAIL: fmdshiloh@aol.com

Willie Austin Davis

Nashville, Tennessee 37203

Re:

CEASE AND DESIST NOTICE

Dear Mr. Davis:

Please be advised that I represent Christ Presbyterian Church ("CPC"), and its related entities, including Christ Presbyterian Academy (CPA), Koinonia, and the Nashville Institute for Faith and Work. I have reviewed your voluminous email communications and your allegations against my client. In your emails, you specifically accuse Matt Moore, CPC, and CPA of being involved in a multifaceted conspiracy. Your email insinuates that Matt Moore, CPC, and CPA participated in a criminal activity regarding a large cover-up for John Perry. You allege that this conspiracy has lasted for years and involves former CPC and CPA alumni and teachers.

Please be advised that Matt Moore, CPA, CPC, and its related entities, are not and have never been involved in any criminal conspiracy, and all of your allegations against them are patently false. Any assertion on your behalf otherwise is intentionally designed by you to harm CPC, CPA and Matt Moore.

Please be advised that you need to immediately cease and desist any further communications to and regarding Matt Moore, CPC, CPA, and any other related entity. This includes ceasing all communications with Matt Moore, individually, and sending your inflammatory emails to employees of CPC and CPA. Your actions have defamed the character of both Matt Moore, CPC and CPA, and constitutes libel *per se*, harassment, and false light invasion of privacy.

Please be advised that if you send another communication to Matt Moore, CPA, CPC, or any of its related entities, or employees, then my client will be left with no option but to take any and all legal action against you to protect CPC, its related entities, and employees from your intentionally harmful actions. Nothing in this correspondence is a waiver or should be interpreted as any kind of waiver of any rights and remedies of Matt Moore, CPC, or any of its related entities, all of which are expressly reserved.

Yours to Call Upon,

Robert M. Pautienus, III

RMP/as

EX3

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Middle Tennessee Boy Scouts Executive Board



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January 2021 to January 2022

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USA Today VP - Editor - Falsely told **Austin Davis that The Tennessean had** already covered the story. Is the Gannett Corporation a criminal enterprise that protects alleged child sex abuse and alleged murder?

Mr. Michael

The Tennessean

Voting

Mr. Rick Archer

Legends Bank

Voting

Mr. DeVan D. Ard, Jr.

Reliant Bank

Voting

Mr. Chris Armstrong

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Voting

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| | Ms. Karen Bengtson | | Voting | |
| | Mr. Blaine Bishop | | Voting | |
| ¥ | Mr. Chad Blackburn | eDoc4U | Voting | Sen. Marsha Blackburn's son – Christ Presbyterian Church – Christ Presbyterian Academy. |
| | Mr. Steve Blackmon | Rogers Manufacturing | Voting | Christ Presbyterian Academy. |
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| | Mr. Alex Brandau | Alexander Brandau Partners | Voting | |
| | Mr. Tyler Brandes | | Voting | |
| | Mr. Reuben Brigerty | University of the South | Voting | |
| | Mr. Clay Bright | | Voting | |

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| onar General | Voting |
| Tennessee Bank | Voting |
| te & Touche LLP | Voting |
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| Fargo Advisors | Voting |
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| IC Structural Engineers | Voting |
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| rative Storage | Voting |
| ltn for Health & Wellness | Voting |
| | Voting |
| | te & Touche LLP Fargo Advisors IC Structural Engineers Covalus VV Capital tate Cardiology Associates IT Corporation uth Member th & Cashion vative Storage |

Federal Judge - Covenant Presbyterian
Church Elder - Star DA Prosecution
witness against Austin Davis with Juror #
5, Andrew McDonald, voting to convict.
Andrew McDonald is married to Harpeth
Hall graduate, Brenner McDonald.

| Mr. Rodney Cohen | Meharry Medical College | Voting | |
|-------------------------------------|------------------------------|--------|--|
| Mr. Russ Connelly | Craters and Freighters | Voting | |
| Mr. Dan Cook | Dan Cook Law | Voting | |
| Mr. Jeff Cook | Bridgestone Americas | Voting | |
| Chancellor Robert E. Corlew, III | | Voting | |
| Chancellor J. B. Cox | Chancellor, 17th District | Voting | |
| Mr. Justin D. Crosslin | Crosslin & Associates PC | Voting | |
| Mr. Andy Daniels | | Voting | |
| Mr. Jerry Deal | Piedmont Natural Gas | Voting | |
| Mr. William R. DeBerry | Reliant Bank | Voting | |
| Mr. Dan Dellinger | Reliant Bank | Voting | |
| Mr. Steve Dix | Dix and Associates | Voting | |
| Mr. Duane Dominy | Dominy and Assc. | Voting | |
| Mr. Jim Dyer | Metal Products Company | Voting | * |
| Mr. John Eakin | Eakin Partners | Voting | Woodmont School classmate and team- mate with Austin "Austy" Davis. Mont- |
| Mr. Mark Emkes | Bridgestone Americas | Voting | gomery Bell Academy Board Member. |
| Mr. Pete Ezell | Baker Donelson | Voting | |
| Mr. Todd Falk | Qualderm Partners | Voting | |
| Dr. Jim Felch | Vanderbilt Eye Clinic | Voting | |

| M | fr. Cy Fenton | CISO | Voting | |
|-------|-----------------------------|--------------------------------|--------|---|
| M | r. Harry Fisk | | Voting | |
| Mr | . Robert Flack | Quantum Insurance Partners | Voting | |
| | Mr. Sam O. Franklin, III | SunTrust Bank | Voting | |
| Dr. 1 | Mark Freeland | Endodontic Associates | Voting | |
| Mr. | Kent Freeman | Ingram Content Group | Voting | |
| Mr. | John Garland | | Voting | |
| Mr. | David Garrett | Cheatham, Palermo & Garrett | Voting | |
| M | r. Armando Garza | You Science | Voting | |
| ₩ M | fr. Howard Gentry | Metro Government | Voting | Davidson County Criminal Court Clerk where rigged indictment, trial, and |
| Ms. S | Sharon Gentry | | Voting | post-conviction proceedings against Austin Davis took place: Ex-Judge |
| Mr. I | Landon Gibbs | Altitude Ventures | Voting | Casey Moreland imprisoned for public corruption; Judge Steve Dozier; |
| Dr. | Jeff Gordon | | Voting | and Judge Cheryl Blackburn. |
| Dr. | Mark Green | | Voting | |
| Mr. 1 | Mike Greene | Lester Greene & McCord Ins. | Voting | |
| | lr. Robert Juisinger | Edgenet, Inc. | Voting | |
| | nator Bill laggerty | Politician | Voting | Gallatin native – 18-year-old Grant Solomon was allegedly murdered in |
| | Carl Haley resident | Grand Avenue | Voting | Gallatin to cover-up the child sex abuse of his 11-year old sister, Gracie Solomon. |

| | Mr. John Harney | Park Trust Dev. Co. LLC | Voting | |
|---|--------------------------------------|----------------------------------|--------|--|
| * | Mr Howard Harris | | Voting | Has represented The Tennessean, and |
| | Mr. Robb Harvey | Waller Lansden Dortch & Davis | Voting | may still represent the Tennessean? WSMV TV Attorney who threatened Austin Davis on behalf of WSMV TV and Demetria |
| | Mr. Aubrey B. 'Trey' Harwell, III | Neal & Harwell | Voting | Kalodimos during the John Perry – Mann Act Federal crime cover-up. MBA Father and |
| | Mr. Aubrey B. Harwell, Jr. | Neal & Harwell | Voting | married to a Harpeth Hall Alumna. Former WSMV TV news anchor, Aaron Solomon, is the alleged rapist of 11-year old Gracie |
| | Mr. Harris Haston | Carter-Haston Holdings | Voting | Solomon, and the alleged murderer of 18- year old Grant Solomon. |
| | Mr. Don Haynes | Retired | Voting | |
| | Mr. Scott Heard | Quickway Carriers | Voting | |
| X | Todd Henry | Metro Police Dept. | Voting | Retired Deputy Chief of Police. Nashville Police have covered up the John Perry – |
| 1 | Mr. Waymon L. Hickman | First Farmers & Merchants Bank | Voting | Mann Act Federal crime cover-up since July 2, 2008. |
| | Mr. William Hickman | Retired | Voting | |
| | Dr. James Hildreth | Meharry Medical College | Voting | |
| | David Hill | | Voting | |
| | Mr. Damon T. Hininger | CoreCivic, Inc. | Voting | |
| | Mr. Jay Hollomon | Vaco, LLC | Voting | Nonhous of MADA Described |
| × | Mr. Hank Ingram | Ingram Industries, Inc. | Voting | Nephew of MBA Board Chairman and Pinnacle Financial Partners Board Member, |
| | Mr. Julius Johnson | Maury County Agriculture | Voting | David Ingram, and MBA Board Member John Ingram, a former Harpeth Hall Board Member . Nashville Soccer Club |
| | Mr. Jerry Kennon | | Voting | Director of Corporate Partnerships. |

| Mr. Paul Ketchel | MDSave | Voting | |
|----------------------------|----------------------------------|--------|--|
| Senator Bill Ketron | TN State Legislature | Voting | |
| Mr. D. J. King | Clayton Associates | Voting | |
| Ms. Teresa Kingery | Kingery & Associates | Voting | |
| Mr. Tab Kirkland | HTK Wealth Management, LLC | Voting | |
| Mr. Paul Kleine- Kracht | | Voting | |
| Dr. Kurt Kowalski | Tennessee Othopedic Alliance | Voting | |
| Mr. John Langsdon | Columbia Machine Works, Inc. | Voting | |
| Mr. Jim Larson | | Voting | |
| Dr. John W. Lea | | Voting | |
| Ms. Nancy Leach | Facilities Planners, Inc. | Voting | |
| Mr. Jim Lehman | Bridgestone Americas | Voting | |
| Mr. Joe Lester | Lester Greene & McCord | Voting | |
| Mr. Daniel Lewis | TriStar Law, Inc. | Voting | |
| Mr. Mack Linebaugh | | Voting | |
| Ms. Kim Looney | Waller Lansden Dortch & Davis | Voting | |
| Mr. Randy Lowry | Lipscomb University | Voting | |
| Mr. Scott Lynn | Ryman Hospitality | Voting | |
| | | | |

Properties, Inc.

| | rioportios, me. | | |
|---------------------------|---|--------|--|
| Mr. Robert D. Massey | Massey & Associates | Voting | |
| Mr. Hill McAlister | Nashville Sash & Door Co. | Voting | |
| Mr. Robert A. McCabe, Jr. | Pinnacle Financial Partners | Voting | |
| Mr. John McDearman | Wilson Bank | Voting | |
| Ms. Sherry McGugin | McGugin Oil | Voting | |
| Mr. Don Miller | DM Services LLC | Voting | |
| Mr. Dan Mohnke | Nissan North America | Voting | |
| Mr. Kevin Monroe | Deloitte & Touche LLP | Voting | |
| Mr. Reggie Mudd | State of Tennessee | Voting | |
| Mr. Roland Myers | TN Retail Assc. | Voting | Connected to Christ Presbyterian |
| Mr. Burke Nihill | TN Titans | Voting | Academy? Still waiting on a response |
| Mr. Mike O'Malley | Wendy's of Bowling Green | Voting | to my e-mails about Steve McNair's rigged grand jury. Mrs. Lucille McNair deserves better treatment from |
| Mr. Richard Olszewski | 2 | Voting | Nashville Police. |
| Mr. Larry Papel | Nelson Mullins Riley & Scarborough, LLP | Voting | |
| Mr. Gary Parkes | Parkes Company | Voting | |
| Mr. John Pearce | Ernst & Young | Voting | |
| Ms. Andrea Perry | Bone McAllester Norton PLLC | Voting | |

| | - | |
|-----------------------------|--------------------------------------|--------|
| Mr. Clay Petrey | Sugar Tree Asset Mgmt. | Voting |
| Ms. Gail Plucker | | Voting |
| Ms. Delishia Porterfield | Dream Consulting | Voting |
| Dr. Cary W. Pulliam | Middle TN Vascular Associates | Voting |
| Dr. David Raiford | VUMC | Voting |
| Ms. Carolyn Rambo | Pinnacle Financial Partners | Voting |
| Mr. Mark Raulston | Farm Bureau Ins. | Voting |
| Col. James A. Reed | Tennessee National Guard | Voting |
| Mr. Jason Ricciardi | CGMA | Voting |
| Mr. John Richardson | Peachtree Planning | Voting |
| Mr. John H. Roe, Jr. | Sherrard & Roe | Voting |
| Dr. Ian Romaine | Vanderbilt University | Voting |
| Mr. Joe Russell | Elan-Polo, Inc. | Voting |
| Mr. Scott Sager | Lipscomb University | Voting |
| Mr. Craig Salazar | Sleep Centers of Middle Tennessee | Voting |
| Mr. Dexter Samuels | Meharry Medical College | Voting |
| Mr. Gary D. Sasser | Averitt Express | Voting |

| Mr. Patrick Sheehan | TEMA | Voting |
|--|--------------------------------|--------|
| Mr. Jerry Shelton | Cryoport | Voting |
| Mr. Fant Smith | Business Owner | Voting |
| Mr. Jerry Smith | 146 | Voting |
| Mr. Jerry Smith | Lawyer | Voting |
| Mr. Rick Smith | | Voting |
| Mr. Montee Sneed | Caledonian Financial, Inc. | Voting |
| Mr. Chris Snoddy | | Voting |
| Mr. James (Jimmy) W. Spradley, Jr. | Standard Candy Company | Voting |
| Mr. George Stadler | HMS Capital Management | Voting |
| Dr. Tyler Staelin | | |
| Mr. Lelan Statom | NewsChannel 5 | Voting |
| Mr. Joe N. Steakley | HCA | Voting |
| Ms. Linda Stinson | Retired | Voting |
| Ms. Laquita Stribling | Randstad | Voting |
| Mr. Eric Strickland | 3LS | Voting |
| Mr. Jack Stringham | Bone McAllester Norton PLLC | Voting |
| Mr. Nathan Summar | CHS | Voting |

| Mr. Hoover Sutherland | Wilson County Motors | Voting |
|--------------------------|-----------------------------------|--------|
| Mr. Hugh C. Tanner | Raymond James | Voting |
| Mr. Jorge Tarajano | Compass Executives | Voting |
| Mr. Jack B. Turner | Jack B. Turner & Associates, Inc. | Voting |
| Mr. Tony Turner | | Voting |
| Mr. Bob VanCleave | Assured Partners | Voting |
| Mr. Bradford Viera | ServisFirst Bank | Voting |
| Mr. Andrew Wall | Jones Brothers Construction | Voting |
| Mr. Giles Ward | Hashed Health | Voting |
| Mr. Ken Weaver | TVV Capital | Voting |
| Mr. Phillip Welker | Hotel Owner | Voting |
| Mr. Cameron Wells | Truist | Voting |
| Mr. Joe Wheeler | Corenelius & Collins | Voting |
| Mr. Pete Williston | Citizens Bank | Voting |
| Mr. Ward Wilson | U. S. Bank, N.A. | Voting |
| Dr. Charles Womack | | Voting |
| Mr. Walt Wood | | Voting |

What are the Boy Scouts Practices Upon Reports of Convicted Juvenile Offenders?

This is Part 4 of my family's #churchtoo story.

<u>Part 1 — Police and DCS Response to Sexual Abuse Allegation in Church Childcare Setting</u>

Part 2 - Confidentiality Agreements Conceal Abuse

Part 3 - Complicit or Complacent

Background

In the prior posts, I shared that our family was involved in a church in which there were allegations of sexual abuse reported on August 30, 2014, with the date of the incident August 24, 2014. The offender and his family denied the abuse. According to an individual at the Child Advocacy Center, Brentwood Police Detective John Wood considered the offender believable. John Wood gave a directive to the church to not inform the families with children under the supervision of the offender. On July 30, 2015, families of children in the offender's three-year-old class were notified of a meeting regarding an incident in our children's classroom. On August 2, 2015, we met with pastors and elders and learned there was an incident of a sexual nature between two juveniles in our child's classroom, charges had been filed, and a court date was pending. We were told that we would be updated as the case progressed. On November 8, 2015, I followed up via email and received a call back from a pastor who told me that the teen was through the courts and was not permitted on the church campus. On November 30, 2015, we learned that a lawsuit was filed against the church alleging the male teen volunteer orally and anally raped a three-year-old boy.

Once we learned about the horrific allegations, we were concerned for our son, who was two and three-years-old while under the supervision of the convicted offender. We contacted church leaders and the police, none of whom could provide any assurance that our child was safe from harm under the supervision of the convicted offender. They told us these thing privately while publicly refuting claims in the lawsuit or maintaining a posture of silence.

The investigation in 2014 and 2015 was limited to considering only the one disclosing child. As such, there was a missed opportunity to uncover the potential full scope of the

situation. With young children, there is a limited window of opportunity to do an interview as their long term memory is not as developed as an older child or an adult. Parents learning of an incident one year or more after exposure is too long to wait. No one can say for certain the offender didn't attack multiple children multiple times. Potentially, he could present more danger to the community than a one-time offender.

Church members may feel secure that the offender was monitored while on the campus prior to his court hearing and was later banned from the church campus. But, the offender didn't disappear from the face of the earth. He was in other settings, which may not have been informed of the very severe allegations and consequent conviction.

Reporting Suspicions of Convicted Offender in Boy Scouts

- In prior posts, I explained that I attempted communications with the parents of the juvenile offender. While doing online searches for the family, I found the father's contact information on a merit badge counselor list for a local boy scout troop in Nashville. I was able to use that information to attempt contact with the parents. I was concerned that the teen offender might be participating in the troop. However, I wasn't certain he was still participating.
- Later, I saw a flyer on the troop website for a trip that the father of the teen offender led. At that point, I sent an email listed on the site below to the Middle Tennessee Boy Scouts informing that I suspected a convicted juvenile offender was in a troop.

https://web.archive.org/web/20161113072815/http://www.mtcbsa.org:80/Parents/scout/aboutus/whistleblower.html

I received a call back from Larry Brown, who found a scout with the same name as the offender's on the roll. We discussed the situation at the church, and he seemed concerned for the young children. He commented that there is usually more than one victim. We further discussed that I had learned the convicted offender had no jail time and that because juvenile records are sealed, there would be no reason that scout leaders or anyone else would have known about the very serious allegations and the conviction. I left the conversation with the understanding that Larry Brown would be contacting the church.

X

I later emailed him a timeline of events and provided contacts for both the police and DCS. I wrote that I would appreciate his advocacy.

Included in the information I sent Larry Brown were the attempted contacts to the teen's father in which I asked the parents if the teen ever brought my son to the bathroom. I didn't receive a reply. I felt that the lack of responsiveness from the father was unbecoming of a scout leader in that he was not kind enough to provide a reply to

- my very reasonable questions regarding my very young and vulnerable child who was under his family's care.
- The Boy Scouts have been riddled with abuse scandals including a recent one in Nashville involving former Scout leader Darrell Fisher.

https://www.wkrn.com/news/west-meade-man-taken-into-custody-for-rape-of-12-year-old-boy/1091588745

https://www.tennessean.com/story/news/crime/2016/05/04/indictment-ex-scout-leader-sexually-abused-5-boys/83926632/

http://www.wsmv.com/story/36263661/former-nashville-boy-scout-leader-sentenced-to-18-years-in-prison

Because of the abuse scandals that have plagued the organization, I know they have developed some of the best abuse prevention protocols, so I trusted that Larry Brown would take the best course of action.

Contacting Christ Presbyterian About Convicted Abuser

To give some background on the teen's family, his father runs a ministry that does overnight events for youth and adults, including events with both youth and adults. The father's ministry does fundraisers, and these fundraisers are sometimes at church facilities. For instance, while the teen was being investigated for sexual abuse against the three-year-old at the Brentwood church, the ministry held their fundraiser at the Brentwood church.

Later in the year after I had made a report to the Boy Scouts and spoke to Larry Brown, the teen's father held a fundraiser at Christ Presbyterian Academy. This school is related to the church that sponsors the troop that it appeared the teen and his father participated in. It didn't make sense to me that if the church had been notified of the teen's conviction and his presence in the troop, that the father's ministry would be hosting a fundraiser at the church.

- As an aside, around this time, I also saw evidence the family participated in another Nashville troop, but it appears they changed troops several years ago.
- I decided to contact the church and learned that Todd Teller would be an appropriate person to contact. I sent an email to both him and the Senior Pastor Scott Sauls. The reply I received is below.

Scott Sauls <ssauls@christpres.org>
Tue, Dec 12, 2017, 11:39 AM
to Todd, me

Dear (Jane),

This is the first I have heard of this.

Thank you very much for bringing your concern to our (and my) attention. I have reached out directly to congregational care and asked that you receive a call as soon as possible.

Scott Sauls

X

I spoke to the congregational care minister Todd Teller after this email and explained the situation.

I don't know what, if any, action the Boy Scouts took. Nor do I know what, if any, action Scott Sauls took.

By this time, the convicted offender should be 18 years old, so he should be ineligible to participate in the Boys Scouts based on his age. I am curious to know if the convicted offender has been listed in the Ineligible (IV) Volunteer Files. I am not sure how juvenile offenses affects a person's record in adulthood, but I wonder if a criminal background check would show an offense.

What I do know is that parents whose children are participating in activities that present a higher risk for abuse such as camping and other overnight events, are entitled to know the Boy Scout's official position on convicted juvenile offenders (particularly violent offenses), and more importantly the Boy Scout's actions based upon a notice of a convicted juvenile offender within a troop(when he was a juvenile).

According to the <u>training guide</u> regarding the prevention of youth-on-youth abuse, important information on page 8 states regarding higher risk activities for abuse,

"It's important that we remind everyone that youth-on-youth abuse can occur in Scouting during any activity, but especially where observation or adult supervision is limited. This includes overnight activities and events that occur in less-structured environments as well as secluded areas in regular meeting places. Higher risk situations include overnight hotel stays, overnight tenting and camping, and situations involving group latrine and/or showering facilities."

In addition, page 9 lists some facts about abuse and youth:

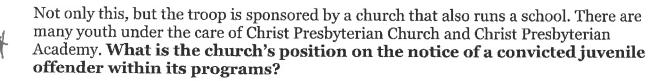
- More than one-third of serious physical and sexual abuse incidents are committed by youth (U.S. Department of Justice, Juvenile Justice Bulletin, 2009, "Juveniles Who Commit Sex Offenses Against Minors").
- Nearly one out of every four students (22 percent) report being bullied during the school year (National Center for Education Statistics, 2015). Further, 19.6 percent of high school students report being bullied at school in the past year; 14.8 percent report being bullied online (Centers for Disease Control and Prevention, 2014).

Research indicates the peak age for male youth offenders is age 13 to 16.

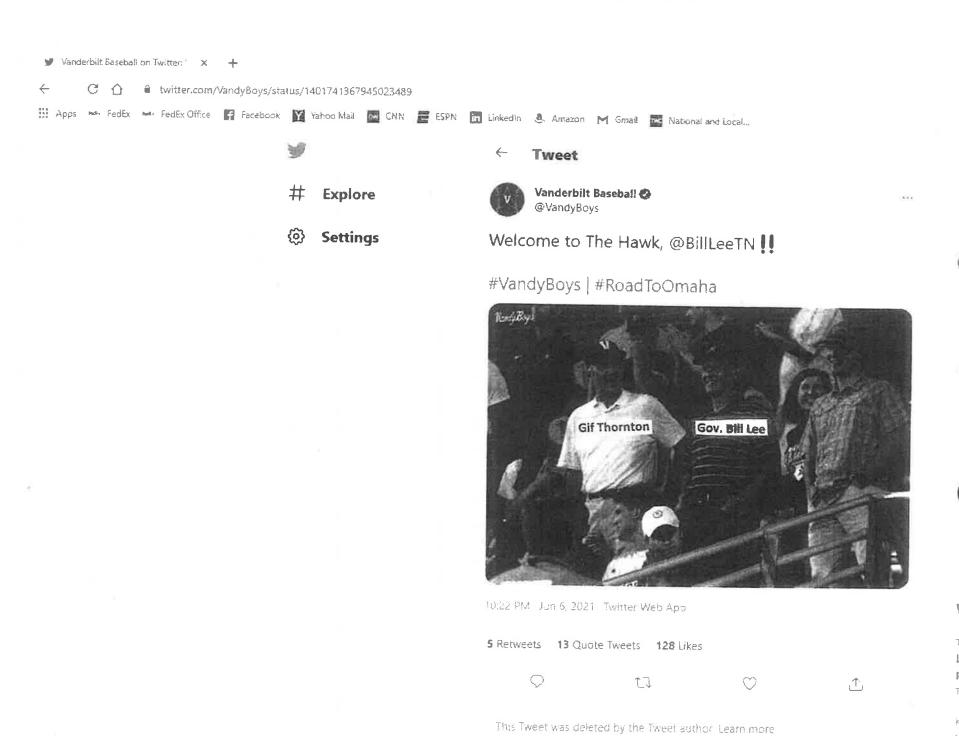
• Targets of (sexual) abuse tend to be boys and girls three to five years of age younger than the perpetrator.

Sexual experimentation can lead to abuse.

· Youth offenders who groom and abuse can be of any age or demographic.



June 6, 2021 - Gov. Bill Lee and Gif Thornton at Vanderbilt Baseball Game



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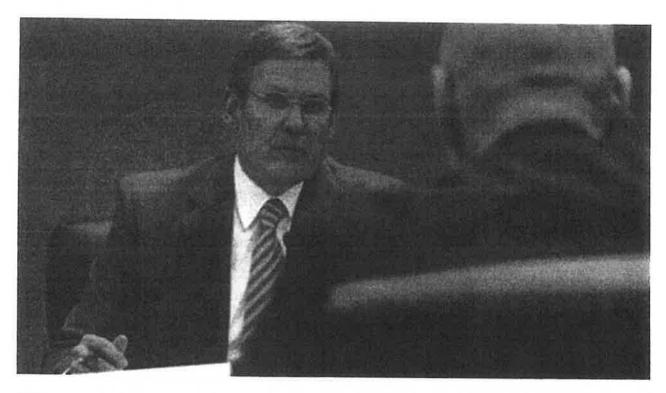
Nashville Post

POLITICS

Lee names new judicial appointments councilors

Also: Governor announces money for school safety, TNGOP has new press secretary

- STAFF REPORTS
- FEB 22, 2019



Bill Lee

This week, Gov. Bill Lee announced he had named four people to the Governor's Council for Judicial Appointments, the body that screens and recommends candidates for appellate vacancies in Tennessee.

Gif Thornton, managing partner of Adams and Reese, will chair the council. A

Nov 10, 2021; Chairman Gif Thornton and the Appointment were scheduled to meet and
review 5 candidates to replace Indo Alan E. Glenn on the same day as the
candidisht visil to honor Grant solomon at the state Capital.

TENNESSEE BAR ASSOCIATION

Faculty Profile: Gif Thornton, Jr.



Gif Thornton, Jr. Adams and Reese LLP424 Church St Suite 2700Nashville, TN 37219 Work Phone: (615) 259-1492 Email Address: gif.thornton@arlaw.com

Previous Courses Taught (7)

- The Ethical Campaign: The Ethics of Lobbying
- The Ethical Campaign: The Ethics of Campaign Finance and Compliance
- The Ethical Campaign
- The Ethical Campaign: Campaign Finance Compliance
- The Ethical Campaign: Maintaining Ethics and Professionalism in Elections
- The Ethical Campaign: Finance Compliance
- The Ethical Campaign

Biography

Gif Thornton became Managing Partner of the firm in March of 2015. He serves as legislative counsel to a number of businesses, trade associations and governmental entities with interests before Tennessee state government. In addition, he represents clients before regulatory boards and administrative agencies of local, state and federal government. He has extensive experience in the areas of education, energy, health care, insurance, technology, transportation and utilities. His other significant contributions include: Named as the highest ranked lawyer/lobbyist on the Power 100 list of influential people in Tennessee, compiled annually by Business TN®. Named as Best Lawyers® "Lawyer of the Year" in 2014 for Government Relations Lawyers. Gif is a former member of the Davidson County Election Commission and has served as counsel to a number of statewide Republican campaigns. He was appointed by Nashville Mayor Karl Dean to the Board of the Metropolitan Development Housing Agency, as well as the Board of the Tennessee Business Roundtable. He is a Fellow of the Tennessee and Nashville Bar Foundations. He is former Board President of the Legal Aid Society of Middle Tennessee. He has served on the Board of Trust of Vanderbilt University and is currently on the board of the Hermitage, the home of Andrew Jackson, and Covenant Theological Seminary in St. Louis, MO. He is an elder at Christ Presbyterian Church in Nashville. Gif counts his professional mentor and partner Bill Bruce among the people he most admires for setting the standard for excellence in client service through hard work, a keen mind and unquestioned personal character. Gif and his wife Anna have four children. When not at work or at home, Gif enjoys running and has completed a number of marathons, including those in Boston, New York, Chicago and Washington DC. Prior to law school, Gif worked in the Foreign Service as Special Assistant to the Ambassador at the American Embassy in Paris, France.

Gif Thornton - Nashville Presbytery Standing Judicial Committee

