

IN THE CIRCUIT COURT FOR THE COUNTY OF HOWARD, MARYLAND

Will McRaney,

Plaintiff

vs.

Tom Stolle, individually and as an agent of BMCD

Serve: Tom Stolle  
303 Summer Walk Blvd.  
Milton, DE 19968

And

Thomas Winborn, individually and as an agent of BMCD

Serve: Thomas Winborn  
4180 Riverchase Dr.  
Southside, AL 35907

And

Defendants

Steve Fehrman, individually and as an agent of BMCD

Serve: Steve Fehrman  
11282 Gunsmoke Ct.  
Lusby, MD 20657

And

Baptist Convention of Maryland/Delaware, Inc.

Serve: Jeffrey T. Agnor, Resident Agent  
Davis Agnor Rapaport and Skalny, LLC  
Suite 600  
10211 Wincopin Circle  
Columbia, MD 21044

COMPLAINT  
(JURY TRIAL DEMANDED)

The Plaintiff, Will McRaney, for his Complaint in the above matter, states as follows:

Parties

1. Plaintiff, Will McRaney (herein "McRaney"), is an adult resident of 9448 Lake Hickory Nut Dr., Winter Garden, Florida 34787 who is a past Executive Director of the Baptist

Convention of Maryland/Delaware, Inc., whose principle place of business located at 10255 Old Columbia Rd, Columbia, MD 21046.

2. On information and belief, Defendant Tom Stolle, (herein “Defendant Stolle”), both individually and as an agent of BCMD, is currently a resident of Milton, Delaware and was an officer and the Chief Financial Officer of the Baptist Convention of Maryland/Delaware, Inc. at all times relevant to this matter.

3. On information and belief, Defendant Thomas Winborn (herein “Defendant Winborn”), both individually and as an agent of BCMD, is currently a resident of Southside, Alabama and was a member of the governing General Mission Board of the Baptist Convention of Maryland/Delaware, Inc. at all times relevant to this matter.

4. On information and belief, Defendant Steve Fehrman (herein “Defendant Fehrman”), both individually and as an agent of BCMD, is a resident of Lusby, Maryland and was a member of the governing General Mission Board of the Baptist Convention of Maryland/Delaware, Inc. at all times relevant to this matter.

5. Defendant Baptist Convention of Maryland/Delaware, Inc. (herein “Defendant BCMD”) was at all times relevant to this matter a Maryland corporation in good standing doing business in the State of Maryland.

#### Jurisdiction

6. McRaney realleges and incorporates paragraphs one through five as if more fully set forth herein.

7. The events which give rise to this matter either originated in or occurred in the State of Maryland.

#### First Cause of Action – Defendant Stolle

8. McRaney realleges and incorporates paragraphs one through seven as if more fully set forth herein.
9. In and around August 2015 Defendant Stolle, both individually and as an agent of BCMD, made defamatory statements regarding McRaney with staff at Defendant BCMD.
10. The statements which Defendant Stolle made regarding McRaney were false and slanderous.
11. The statements which Defendant Stolle made were not known by McRaney until May 3, 2019.
12. The affidavit of Donna Jefferys attached as Exhibit One outlines the statements of which McRaney first became aware on May 3, 2019. Donna Jefferys, a previous employee of Defendant BCMD has stated in an affidavit that “Interim Director Stolle told me in the BCMD office building that Dr. McRaney threatened BCMD attorney Jeff Agnor.” Donna Jefferys has further stated in the same affidavit “Stolle also told me that other BCMD staff members were afraid of Dr. McRaney.” She further states that the staff members “indicated they were not afraid and did not feel threatened by Dr. McRaney.”
13. Defendant Stolle made the statements knowingly, that is, without inadvertence or without mistake.
14. Defendant Stolle is legally at fault for making the statements.
15. Defendant Stolle’s actions have caused McRaney to suffer damages in the form of damage to his reputation essential for his employment in the leadership of Christian ministry as well as financially.

Second Cause of Action – Defendant Winborn

16. McRaney realleges and incorporates paragraphs one through seven as if more fully set forth herein.
17. On or about February 6, 2016, March 6, 2016 and April 6, 2016 Defendant Winborn made defamatory statements regarding McRaney in a public forum on a website known as “SBC Today”.
18. The statements which Defendant Winborn made regarding McRaney were false, and libelous.
19. Defendant Winborn made the statements knowingly, that is, without inadvertence or without mistake.
20. Defendant Winborn is legally at fault for making the statements.
21. Defendant Winborn’s actions have caused McRaney to suffer damages in the form of damage to his reputation essential for his employment in leadership of Christian ministry as well as financially.

Third Cause of Action – Defendant Fehrman

22. McRaney realleges and incorporates paragraphs one through seven as if more fully set forth herein.
23. On or about November 13, 2017 Defendant Fehrman made defamatory statements regarding McRaney in a public forum on the Facebook page of an entity known as Connect 316.
24. The statements which Defendant Fehrman made regarding McRaney were false and libelous.
25. Defendant Fehrman made the statements knowingly, that is, without inadvertence or without mistake.
26. Defendant Fehrman is legally at fault for making the statements.

27. Defendant Fehrman's actions have caused McRaney to suffer damages in the form of damage to his reputation essential for his employment in leadership of Christian ministry as well as financially.

Fourth Cause of Action – Defendant BCMD

28. McRaney realleges and incorporates paragraphs one through twenty-seven as if more fully set forth herein.

29. At all times relevant to this matter, Defendant Stolle was an officer of the BCMD and was the Chief Financial Officer (CFO) of the BCMD and at points the Interim Executive Director of the BCMD.

30. At all times relevant to this matter, Defendants Winborn and Fehrman were members of the governing General Mission Board of the BCMD.

31. At all times relevant to this matter, Defendant Stolle acted as an agent of BCMD in his official capacity as an officer and the CFO of the BCMD.

32. At all times relevant to this matter, Defendants Winborn and Fehrman acted as agents of BCMD in their official capacity as members of the governing General Mission Board of the BCMD.

33. BCMD is responsible for the defamatory and/or libelous statements made by Defendants Stolle, Winborn and Fehrman because of their acting as agents for BCMD.

34. BCMD has not at any time repudiated or otherwise publicly or privately denied the statements of Defendants Stolle, Winborn and Fehrman.

35. The statements of Defendants Stolle, Winborn and Fehrman have caused McRaney to suffer damages in the form of damage to his reputation, his employment as a trusted Christian minister and leader, as well as financially and seeks compensation for all damages to reputation,

economic loss, intentional infliction of emotional distress, and punitive damages for the intentional acts of the defendants.

WHEREFORE, Plaintiff, Will McRaney, requests the Court enter judgement against Tom Stolle, Thomas Winborn, Steve Fehrman and the Baptist Convention of Maryland/Delaware, Inc. for compensatory damages, punitive damages, and attorneys' fees in the amount to be determined by the jury.

DEMAND FOR JURY TRIAL

Plaintiff, McRaney, hereby demands a trial by jury.

The 30<sup>th</sup> day of April, 2020.

Respectfully Submitted,



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Will McRaney  
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407-595-4443