

EXHIBIT P

WILL MCRANEY vs N. AMERICAN MISSION BOARD, ET AL.
Sandy McRaney - 02/07/2023

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF MISSISSIPPI
3 ABERDEEN DIVISION

4 -----X

5 WILL MCRANEY :

6 Plaintiff :

7 v. :No. 1:17cv080-GHD-DAS

8 THE NORTH AMERICAN MISSION :

9 BOARD OF THE SOUTHERN :

10 BAPTIST CONVENTION, INC. :

11 Defendant. :

12 -----X

13

14 Deposition of SANDY MCRANEY

15 1401 New York Avenue, N.W.

16 Washington, D.C.

17 Tuesday, February 7th, 2023

18 9:00 a.m. (EST)

19

20

21

22

23 Job No.: 15383

24 Pages 1 - 204

25 Reported by: Stefanie Towns, CCR

Page 182

1 source of information for me that Kevin Ezell
 2 prays for Will and I as you have stated that
 3 he does.
 4 **Q. Did you receive a thank you note from Kevin**
 5 **Ezell after Dr. McRaney sent him a plant in**
 6 **2016?**
 7 A. I do -- I do not know if I received a thank
 8 you note from Kevin Ezell in terms of a plant
 9 that was sent to him in 2016.
 10 **Q. Do you know if Dr. McRaney received a thank**
 11 **you note?**
 12 A. I am not aware that Dr. McRaney received a
 13 thank you note in regard to a plant.
 14 (Exhibit 5 was marked for identification and
 15 is attached to the transcript.)
 16 **Q. Sandy, the court reporter has handed you what**
 17 **has been marked as Exhibit 5 to your**
 18 **deposition. Have you seen that before?**
 19 A. I don't know whether I've seen this before or
 20 not.
 21 **Q. Can you read it for the record, please?**
 22 A. Sure. Dated August 15th, 2016. It states,
 23 Will, thank you for the plant and note.
 24 Grateful for your prayers. Wish you the very
 25 best and will continue to pray for you, as

Page 184

1 did you know that.
 2 MR. GANT: Well, why don't you show her
 3 the document then.
 4 MS. CARRINGTON: I don't have it on me
 5 right now.
 6 MR. GANT: Well, then put it in the form
 7 of a question, not an assertion.
 8 MS. CARRINGTON: I did make a it is a
 9 question.
 10 **Q. Did you know and you can, no, I didn't know**
 11 **this, or I don't know what you're saying is**
 12 **true --**
 13 MS. CARRINGTON: I mean she can answer
 14 however she wants to answer, Scott.
 15 **Q. Did you know that Kevin Ezell was the one**
 16 **that approved giving you and Dr. McRaney the**
 17 **\$30,000 transition money to get yourself to**
 18 **Maryland Delaware?**
 19 MR. GANT: Objection. Assumes facts not
 20 in evidence. Lack of foundation as to
 21 speculation.
 22 A. I would not have any knowledge that Kevin
 23 Ezell was the one who approved the amount of
 24 money that was given to us for housing.
 25 However, I was aware that the money

Page 183

1 well. Thanks again. Kevin Ezell, NAMB.
 2 **Q. Do you recall receiving \$30,000 from NAMB to**
 3 **help your family transition to the Maryland**
 4 **Delaware area when Dr. McRaney became the**
 5 **executive director?**
 6 MR. GANT: Objection. Calls for
 7 speculation. Assumes facts not in evidence.
 8 A. I do recall receiving an amount of money. I
 9 do believe that I remember it being between
 10 25 and \$30,000 in regard to housing,
 11 temporary housing in Maryland.
 12 **Q. Do you know that Kevin Ezell was the one that**
 13 **approved that amount of money to be sent to**
 14 **you and Dr. McRaney?**
 15 MR. GANT: Are you making a
 16 representation or are you asking her to
 17 assume that?
 18 MS. CARRINGTON: It is in the documents
 19 that have been produced.
 20 MR. GANT: Okay. But that's not good
 21 enough. If you want to ask her -- look,
 22 you're making statements as if they're
 23 established.
 24 MS. CARRINGTON: Well, it is established
 25 because it's in the document. So I'm asking,

Page 185

1 originated as far as the idea was his idea,
 2 and it is -- it was no secret to our board
 3 because we -- Will let our board know that
 4 Kevin had offered that money. And we -- Will
 5 translated that to our board, so that they
 6 would be aware that that offer was made, and
 7 that we had accepted that amount of money.
 8 **Q. You all needed the money in part because you**
 9 **had not yet sold your home in Florida. Is**
 10 **that correct?**
 11 A. I do not know the circumstances in regard to
 12 exactly why that amount of money was offered.
 13 It is my understanding that it related to the
 14 cost of housing in Maryland being greater,
 15 obviously, than what it was in Florida. And
 16 so that was an amount to help with
 17 transitioning.
 18 **Q. When did you sell your home in Florida?**
 19 MR. GANT: Objection. Foundation.
 20 A. I assume you're talking about the home that
 21 we lived in before we moved?
 22 **Q. Yes.**
 23 A. Okay. That home was sold in -- I -- for the
 24 best of my recollection, I'm going to say,
 25 perhaps, January of 2018.

Page 186

1 **Q. And you rented an apartment while you all**
 2 **lived in Maryland -- in the Maryland Delaware**
 3 **area?**
 4 A. We lived in an apartment in an area close to
 5 the offices of the Baptist Convention of
 6 Maryland Delaware.
 7 **Q. Why didn't you all purchase a home in that**
 8 **area?**
 9 A. As I recall, an 1800 square foot home was
 10 approximately \$750,000 in the year 2014ish,
 11 '13 as we were looking.
 12 **Q. So were you all just gonna rent until the**
 13 **prices got better?**
 14 MR. GANT: Objection. Vague.
 15 Foundation. Calls for speculation.
 16 A. Well, it is, I would think, our prerogative
 17 to do our housing however worked best for us
 18 with our finances. So at the point that we
 19 rented, you have to sign a lease for at least
 20 a year or pay extremely more, so we began a
 21 lease in January of '14.
 22 **Q. And so while accepting the \$30,000 from NAMB**
 23 **to transition and doing what was best for**
 24 **your finances, you all went ahead and bought**
 25 **another home in Florida while you were still**

Page 188

1 thinking maybe we should buy a small condo or
 2 something, so that when we returned to the
 3 Orlando area for visits, we will have
 4 somewhere to stay as opposed to our
 5 daughter's home, who did not have a guest
 6 bedroom.
 7 **Q. So you went ahead in August of 2014 and**
 8 **purchased a home in Florida with a \$350,000**
 9 **mortgage on it?**
 10 MR. GANT: Objection. Foundation.
 11 Calls for speculation.
 12 **Q. For visits?**
 13 A. We --
 14 MR. GANT: Same objection.
 15 A. We purchased that home which previously, even
 16 six months before had been on the market for
 17 \$580,000 and so when we purchased that home,
 18 it was because we had already begun planning
 19 for our retirement, and knowing that we
 20 wanted to be in the Orlando area because of
 21 our daughters. At that point at least two of
 22 them were in Orlando. And everybody, most
 23 people like to go to Orlando because of one
 24 theme park or another. So we knew that we
 25 could buy a home there while someone was

Page 187

1 **in Maryland, isn't that true?**
 2 A. We had someone since the house did not sell
 3 in Florida when it was put on the market and
 4 stayed on the market for a long period of
 5 time, our daughter was gracious enough to
 6 continue to stay in the house so it could be
 7 available for showing. Each month that goes
 8 by, though, there's no offer. We're losing.
 9 So we began to rent the home out. So when we
 10 bought the home in Winter Garden, the other
 11 house, someone was living in our other home.
 12 **Q. So you bought a house for your daughter?**
 13 MR. GANT: Objection. Mischaracterizes
 14 testimony.
 15 A. No.
 16 MR. GANT: Lack of foundation.
 17 A. I'm sorry I must not have been clear. The
 18 house at John Marie was rented, someone began
 19 renting that house. And so the house was not
 20 available when we would make visits back to
 21 see our daughter. We have three daughters.
 22 One of which lives in Orlando with now three
 23 grandchildren. At that point in time it was
 24 one and one about to be. But we had no place
 25 to come to, and so we began the process of

Page 189

1 living in our other home at a great deal, and
 2 that we would have a place to eventually
 3 retire. It was also on a lake which has been
 4 a prayer of mine for years that Will would be
 5 able to have the capacity to relax on the
 6 water, because that's a particularly relaxing
 7 time for him.
 8 **Q. Yet you still took the \$30,000 from NAMB to**
 9 **get yourself over to Maryland Delaware?**
 10 MR. GANT: Objection. Objection.
 11 Argumentative. Quite argumentative as this
 12 whole line which is absurd. Vague.
 13 Foundation.
 14 A. Yes, we did take the \$30,000 from the North
 15 American Mission Board at the direction, as
 16 you told me, Kevin Ezell approved that.
 17 That, however, is not uncommon. If in your
 18 research you would look at other executive
 19 directors whose salaries are often paid by
 20 the North American Mission Board themselves
 21 or parts of their even their own salaries,
 22 what made our situation, doesn't necessarily
 23 make our situation different, but we were up
 24 front and disclosed, number one, that we are
 25 receiving this money to help with our

Page 190

1 housing. The rent in Maryland was -- our
 2 rent was \$2400 a month for a, I believe it
 3 was a two bedroom condo that we had -- not a
 4 condo, but an apartment that we had. And we
 5 took one garage. Because with two vehicles
 6 we wanted one -- at least one that would not
 7 have snow on it. So all of this timeframe is
 8 not as clean or as negative as what I'm
 9 perceiving the nature of -- of your question.
 10 Not that you're trying to be that way but
 11 it's -- it's painting a picture that I don't
 12 agree with.
 13 MS. CARRINGTON: Make this Exhibit 6.
 14 (Exhibit 6 was marked for identification and
 15 is attached to the transcript.)
 16 **Q. Sandy, the reporter has handed you what has**
 17 **been marked as Exhibit 6 to your deposition.**
 18 **Do you recognize this to be the mortgage for**
 19 **the home that you currently live in in**
 20 **Florida?**
 21 A. It appears to be but, however, my name is not
 22 on the mortgage.
 23 **Q. Take a look at the very last page. One more.**
 24 A. One more back?
 25 **Q. One more.**

Page 192

1 **Q. That was borrowed August of 2014?**
 2 MR. GANT: Objection. Foundation.
 3 Calls for speculation.
 4 A. Yes, I believe that this is a mortgage but --
 5 **Q. For the home you currently live in today?**
 6 A. For the home that I currently live in this is
 7 not the current mortgage, but this is a
 8 document saying that this is what the
 9 mortgage is, but I am not on our home deed.
 10 **Q. Okay. Do you dispute that this is for your**
 11 **home?**
 12 A. No, I do not dispute that this is for my
 13 home.
 14 **Q. Okay.**
 15 MR. GANT: Sandy, just a reminder to
 16 give me a chance.
 17 THE WITNESS: Sorry.
 18 **Q. All right. Thank you. You can put that**
 19 **aside. After Dr. McRaney separated from**
 20 **BCMD, how long did you all stay in Maryland?**
 21 MR. GANT: Objection. Vague.
 22 A. To the best of my memory there are several
 23 different comings and goings in there. So do
 24 you want immediately upon being terminated?
 25 **Q. When did you officially move away from the**

Page 191

1 A. Oh, okay.
 2 **Q. Is that your signature?**
 3 MR. GANT: That's not on the mortgage
 4 document.
 5 A. Yes.
 6 MR. GANT: These are different
 7 documents, Kat --
 8 MS. CARRINGTON: Okay.
 9 MR. GANT: -- that you've marked.
 10 **Q. This is all part of a package reflecting that**
 11 **you purchased this home in August of 2014 and**
 12 **it has a mortgage on it in the amount of**
 13 **\$360,000. Is that correct?**
 14 MR. GANT: Can I hear the question back?
 15 (The previous question was read back.)Read
 16 back.
 17 MR. GANT: That can't be correct because
 18 you're using present tense to describe a
 19 document from 2014. Do you want to do a new
 20 question?
 21 MS. CARRINGTON: I asked about 2014, is
 22 that what this document is? I'm not trying
 23 to be tricky here.
 24 A. This is a mortgage that says it's for
 25 \$360,000.

Page 193

1 **Maryland Delaware area?**
 2 MR. GANT: Objection. Vague. And to
 3 the extent it calls for a legal conclusion.
 4 A. I believe to the best of my ability and
 5 recollection, that the move in which the
 6 lease was terminated and the items were moved
 7 out of our apartment and departed in a truck,
 8 was some time around the first week of August
 9 of 2015.
 10 **Q. Have you ever been to NAMB headquarters in**
 11 **Alpharetta?**
 12 A. I have been to NAMB headquarters in
 13 Alpharetta.
 14 **Q. When have you been to NAMB headquarters in**
 15 **Alpharetta?**
 16 A. I don't really know the years or time
 17 periods. There are certain conferences that
 18 take place with Will's previous job and
 19 previous before that job that have us in that
 20 the Alpharetta area. I do not know how many
 21 times I have been to NAMB headquarters at
 22 North Point Parkway.
 23 **Q. Have you been inside the building?**
 24 A. I do believe I have been inside the building
 25 at least once.