

# EXHIBIT S

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

Will McRaney,

Plaintiff,

v.

The North American Mission Board of the  
Southern Baptist Convention, Inc.,

Defendant.

Case No. 1:17-cv-00080-GHD-DAS

**DECLARATION OF STEVE WOLVERTON**

I, Steve Wolverton, pursuant to 28 U.S.C. § 1746 hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge of the matters and facts set forth herein.
2. I was a pastor at Canton Baptist Church in Baltimore, Maryland during Dr. Will McRaney's tenure as Executive Director of the Baptist Convention of Maryland/Delaware (BCMD), and continue to hold this position today.
3. In the days following the announcement of Dr. Will McRaney's dismissal in June of 2015, I began to reach out to BCMD staff members to get their insight on what had occurred.
4. Knowing Will McRaney—and the recent excitement in the Network under his leadership—I seriously doubted that Dr. McRaney had voluntarily resigned as Executive Director.
5. In my experience, people are most forthcoming during friendly, informal conversations and their recollections are most accurate when the events at issue are fresh in their minds.
6. So, I called up the BCMD staff members I knew in the days following Will's departure and, through these conversations, I learned a lot.
7. My first conversation with Dr. Bill Warren—the BCMD President during Will's tenure and at the time of Will's termination—immediately focused on the pending loss of NAMB funding.
8. Dr. Warren told me that over the course of several conversations he'd had with Dr. Kevin Ezell recently, he and Kevin had become friends. Dr. Warren stated that Dr. Ezell had convinced him that NAMB was going to withhold funding from the BCMD for as long as Dr. McRaney remained Executive Director.

9. Dr. Warren said that he had relayed this information to BCMD's General Mission Board and that the organization would lose NAMB funding, and thus resources and staff, if Dr. McRaney remained in his position.
10. After hearing this, the Board voted to terminate Dr. McRaney.
11. By the time we finished our conversation, it was very clear that the primary reason for Dr. McRaney's termination was Dr. Ezell's influence and his threat to continue withholding funds from BCMD.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 9, 2023

A handwritten signature in black ink, appearing to read 'SLW', written over a horizontal line.

Steven L. Wolverton