

# EXHIBIT T

**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 RICK WHEELER**

I, Rick Wheeler, 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. This Declaration is based on my personal knowledge of the matters and facts set forth herein.
2. I am currently the President and CEO of the Florida Baptist Financial Services, Inc. I also serve as Executive Director of Florida Baptist Foundation, and Church Growth Investment Fund, Inc.
3. I have previously been a staff member of the Mandarin Baptist Church in Jacksonville and The Florida Baptist Convention. I have also served as the Lead Missional Strategist of the Jacksonville Baptist Association.
4. In August of 2016 I visited the offices of the North American Mission Board of the Southern Baptist Convention, Inc. (NAMB), at 4200 North Point Parkway, Alpharetta, Georgia, to participate in a meeting and training event.
5. During that visit, as I was passing through NAMB's lobby, I saw a picture of Will McRaney, posted at the receptionist desk at NAMB's offices.
6. At the time, I had personally known Dr. McRaney for many years, and was familiar enough with him to be certain the photo was of him.

7. In August 2016, the front desk at NAMB headquarters was a round shape, and situated in the lobby so anyone passing to the side or behind the desk could see the photo of Dr. McRaney.
8. Seeing the photo of Dr. McRaney, I took a photo of the photo with the camera on my mobile phone.
9. In November 2016, I had lunch with Dr. McRaney and his wife, Sandy McRaney.
10. During that lunch, I mentioned that I saw Dr. McRaney's photo posted at the desk in NAMB's lobby and showed them the photo I had taken using my phone.
11. After the lunch, I sent Dr. McRaney a copy of the photo via text message.

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

Executed on November 21<sup>st</sup> 2022.



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