

EXHIBIT J

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

CASE NO.: 1:17cv080-GHD-DAS

WILL McRANEY,
Plaintiff,

vs.

THE NORTH AMERICAN MISSION
BOARD OF THE SOUTHERN
BAPTIST CONVENTION, INC.,
Defendant.

_____ /

VIDEOCONFERENCE

DEPOSITION OF: DANNY DE ARMAS
DATE: THURSDAY, FEBRUARY 16, 2023
TIME: 10:15 A.M. - 4:46 P.M.
PLACE: VIA VIDEOCONFERENCING TECHNOLOGY
STENOGRAPHICALLY
REPORTED BY: JAZZMIN A. MUSRATI, RPR, CRR
Registered Professional Reporter
Certified Realtime Reporter

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1 MR. RAJAVUORI: Object to form.
 2 A. The particulars matter, but it could.
 3 BY MR. GANT:
 4 Q. What about the SBC? Would it violate some
 5 biblical command for the SBC to file a lawsuit?
 6 MR. RAJAVUORI: Same objection.
 7 A. It -- it could. The particulars matter, but
 8 it -- in broad statement, yeah, it could be a violation
 9 for the entities to do that.
 10 BY MR. GANT:
 11 Q. What about First Baptist Church Orlando? Would
 12 it violate some biblical command for it to file a
 13 lawsuit?
 14 MR. RAJAVUORI: Same objection.
 15 A. And I believe that it -- there -- there are
 16 circumstances where it would be a violation.
 17 MR. GANT: Okay. If we could, let's bring up
 18 Tab 7, please, and mark that as Exhibit 2.
 19 (Whereupon, Plaintiff Exhibit 2 was marked for
 20 identification.)
 21 BY MR. GANT:
 22 Q. And while that's being brought up -- there it is.
 23 Do you recognize Exhibit 2?
 24 A. Yes.
 25 Q. What is it?

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1 A. I don't know exactly what it is, but it has --
 2 looks like my profile from a LinkedIn app.
 3 Q. Okay. To your knowledge, do you have a LinkedIn
 4 profile?
 5 A. Would you repeat the question.
 6 Q. To your knowledge, do you have a LinkedIn
 7 profile?
 8 A. Yes.
 9 Q. Did you participate in creating it?
 10 A. Yes.
 11 Q. Did someone help you?
 12 A. No.
 13 Q. You did it yourself?
 14 A. Not to my recollection. Nobody helped me. And,
 15 yes, as best I can remember, I did it myself.
 16 Q. Okay. Does this appear to be an accurate
 17 printout of your LinkedIn profile?
 18 A. Yes, it does appear to be accurate.
 19 Q. Okay. Have you ever been fired or dismissed from
 20 a job?
 21 A. I'm not -- it's possible that as a teenager, I
 22 was, but I'm -- I'm not -- I'm not positive. I'm not a
 23 hundred percent sure.
 24 Q. What -- what was de Armas & Company Management?
 25 A. It was a management company for Christian

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1 ministries and entertainers. Comedians and music
 2 groups.
 3 Q. What kinds of services did it provide?
 4 A. Business management. Booking events and
 5 conferences. General administration for artists.
 6 Q. Did it provide any service for speakers, or was
 7 it principally --
 8 A. Yes.
 9 Q. Yes? Okay.
 10 Did you know someone named David Ring or David
 11 Ring?
 12 A. Yes.
 13 Q. Does that name refresh your recollection about
 14 whether you were ever dismissed or terminated or fired
 15 from a job?
 16 A. I -- that's not how I would describe the end of
 17 that, but we did go our separate ways.
 18 Q. Okay. Was it voluntarily on your part, or was
 19 it -- well, let me stop there. Was it voluntary on your
 20 part, or were you asked by Mr. Ring to no longer provide
 21 work with him or provide professional services?
 22 A. I don't recall exactly how the conversation went.
 23 Q. Okay. What kinds of services did you provide for
 24 him?
 25 A. Ministry management, managing the business side

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1 of everything that we did.
 2 Q. Did you ever meet his wife?
 3 A. I'm sorry. Did I -- say that again.
 4 Q. Did you ever meet his wife?
 5 A. Yes.
 6 Q. Okay. And according to your LinkedIn profile,
 7 you joined First Baptist Church Orlando in or around
 8 April 2008; is that accurate?
 9 A. On staff, yes.
 10 Q. Okay. When did you become a pastor at First
 11 Orlando?
 12 A. April 2008.
 13 Q. And what -- what was your title then, if you
 14 recall?
 15 A. I -- I do not recall. I think it had staff
 16 administration as a part of the title, but I don't -- it
 17 was a pretty lengthy title. I do not recall at all.
 18 Q. Do you recall whether the title had the word
 19 "pastor" in it at that point?
 20 A. As I recall, it did.
 21 Q. Now, your LinkedIn profile says senior associate
 22 pastor. Is that your current title?
 23 A. Yes, it is.
 24 Q. Okay. Was Dr. McRaney a member of First Orlando
 25 at some point?

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1 A. I believe he was.
 2 Q. Is that how you first met him?
 3 A. I think so. We might have met before then,
 4 but -- because we ran in some of the same circles, but
 5 that would be my first recollection of meeting him.
 6 Q. Do you recall what year you first met
 7 Dr. McRaney?
 8 A. I do not.
 9 Q. Okay. Were you already working at First Orlando
 10 when you met him?
 11 A. To my recollection, I was.
 12 Q. Okay. Have you also met his wife, Sandy McRaney?
 13 A. I have.
 14 Q. Do you think -- do you consider Dr. McRaney to be
 15 a person of faith?
 16 A. Yes.
 17 Q. Do you consider him to be intelligent, based on
 18 your interactions?
 19 A. Yes.
 20 Q. Okay. Do you consider Dr. McRaney to be a
 21 believer, based on your experience?
 22 A. I'm sorry. Did you say believer?
 23 Q. Yes. I'm using the word you used earlier, yes.
 24 A. Yeah. The mic broke up when you said it. I
 25 didn't catch the word, but -- yes, I do consider him to

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1 be a believer.
 2 Q. What about his wife, Sandy? Do you have a view
 3 about whether you consider her to be a believer?
 4 A. I have had way fewer interactions with her, but
 5 I -- I would -- yes, I would consider her to be a
 6 believer, from what I do know of her.
 7 Q. Prior to the time that Dr. McRaney became the
 8 executive director of BCMD, how many conversations would
 9 you estimate you had with him?
 10 A. I really don't recollect, but I would think
 11 maybe -- maybe two or three.
 12 Q. Okay. Do you remember whether you had a view
 13 when Dr. McRaney got the job as the executive director
 14 at BCMD about whether that was a good hire by BCMD?
 15 A. I don't recall specifically. I -- I do recall
 16 being pleased for Will.
 17 Q. Okay. You didn't have any concerns, that you
 18 recall?
 19 A. No, sir, I did not have any concerns.
 20 Q. Sitting here now, do you consider Dr. McRaney a
 21 man of integrity?
 22 A. Wow. I'm not sure how to answer that. I want to
 23 say yes, but I -- I'm -- you know, I don't know.
 24 Q. During the period that Dr. McRaney was the
 25 executive director at BCMD, did you ever meet with him

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1 in person?
 2 A. Can I get some clarification. What do you mean,
 3 "meet with him"? Like, have a conversation or have a
 4 meeting?
 5 Q. When you were in the same physical space as him
 6 and have -- and communicated with one another.
 7 A. I'm -- I am not for sure. It is possible that we
 8 had a -- that he was in Orlando while he was there and
 9 saw me here and we spoke. I do not recall having any
 10 conversation while he was there, though.
 11 Q. While Dr. McRaney was the executive director at
 12 BCMD, did you have some responsibilities at NAMB?
 13 A. I'm not exactly sure how the dates correspond,
 14 but I think -- I think there was overlap that I was at
 15 NAMB as a trustee while he was still at BCMD. I believe
 16 there was overlap.
 17 Q. While Dr. McRaney was the executive director at
 18 BCMD, did you have any in-person or other communications
 19 with him in your capacity as a NAMB trustee?
 20 A. Not to my knowledge. Or maybe I should say not
 21 to my recollection. But -- yeah.
 22 Q. So no written communications? No phone calls?
 23 No in-person meetings that you recall?
 24 A. I do not recall any.
 25 Q. Of all the times that you have been in the

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1 presence of Dr. McRaney, have you ever seen him phys- --
 2 threaten physical harm to anybody?
 3 A. No.
 4 Q. Okay. In any other form of communication where
 5 you and Dr. McRaney had both been involved, whether it's
 6 telephone or in writing, have you ever seen or observed
 7 or heard Dr. McRaney threaten physical harm to anyone?
 8 A. I have. I've -- I did have a conversation where
 9 I felt -- I was worried for my safety or his intensely.
 10 Yes. But he is -- I understood the previous question to
 11 be about -- did he say anything threatening?
 12 There was threatening posture and -- and in my
 13 space conversation, but not -- he -- there was nothing
 14 said that was threatening.
 15 Q. Okay. So let's take this in parts. So
 16 Dr. McRaney never said anything in your presence where
 17 you're aware of -- where he used words that threatened
 18 physical harm to anyone; is that right?
 19 A. To my recollection, that is correct.
 20 Q. Okay. And a moment ago, you mentioned a --
 21 you -- I'm going to try and get these words as close to
 22 what you said as possible. If I get it wrong, I -- it
 23 was unintentional, and you can clarify.
 24 A moment ago, you mentioned a conversation where,
 25 I think you said, you worried for your safety based on

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|---|---|
| <p style="text-align: right;">Page 42</p> <p>1 physical proximity and Dr. McRaney's intensity. Is that 2 what you said? 3 A. I'm not sure if that's what I said. I think 4 that's pretty close to what I said, but that would be an 5 accurate -- or a fair description of it. 6 Q. Okay. When was this conversation? 7 A. As best I can remember, I was -- I was serving as 8 a trustee for NAMB already, and he had been terminated 9 by BCMD. I don't know the date of it. My recollection 10 from, you know, what I read, it would be somewhere in 11 '15/'16, but I don't know exactly when it was. And I'm 12 not sure that those are accurate dates. It's just kind 13 of -- I -- yeah. I don't know. That's the best I can 14 give you. 15 Q. Okay. And were you and Dr. McRaney in the same 16 physical space when this conversation occurred? 17 A. Yes. 18 Q. When was the conversation held? 19 A. In our worship center here at First Baptist 20 Orlando. 21 Q. Were others present? 22 A. Yes. 23 Q. Who? 24 A. Several staff. Our Orlando police department 25 security team was still here. It was after one of our</p> | <p style="text-align: right;">Page 44</p> <p>1 their common move is is to move in behind the person 2 that seems to be making us uncomfortable. And if I can 3 easily make eye contact with them -- and then they would 4 intervene. And I did not -- it did not get to that 5 level, probably because I -- I have a relationship with 6 Will, and I was thinking the best of him. But I was 7 uncomfortable. But they did move into place, and then 8 asked me about it after it was over. 9 Q. Okay. So just focusing on the incident for a 10 moment, you did not, either verbally or with body 11 language or your eyes, ask the police to intervene in 12 any way during this conversation with Dr. McRaney, 13 correct? 14 A. That's correct. 15 Q. And the interaction with Dr. McRaney that you're 16 referring to concluded without any incident, correct? 17 A. That is correct. 18 Q. Okay. And you sent -- mentioned a moment ago 19 that someone from the police at the church asked you 20 about the incident; is that correct? 21 A. Yes. 22 Q. What did they ask you? 23 A. "Who was that? What's" -- "What's going on? Are 24 you okay? Do I need to do anything?" Those kind of 25 questions, which are -- their typical kind of response</p> |
| <p style="text-align: right;">Page 43</p> <p>1 services. There was a cadre of people. I'm not exactly 2 sure who all was gathered speaking to different staff 3 members and a pastor. As I recall, there were probably, 4 you know -- I don't -- 20, 30 people still hanging 5 around -- milling around after the service. 6 Q. Okay. And the -- the -- the communication that 7 you're referencing that led you to be worried for your 8 safety, did you report that to the -- the police who 9 were present at the church at the time? 10 A. I did not report it, but they -- they witnessed 11 it. 12 Q. Well -- so you're saying they witnessed the 13 exchange. Did they -- did they come over and confront 14 Dr. McRaney? 15 A. They did not. 16 Q. Okay. So the police witnessed the communication 17 that you're referring to, but they did not take any 18 action; is that correct? 19 A. That is not correct. 20 Q. Okay. So what happened? 21 A. They did take action. 22 Q. What did they do? 23 A. Their practice -- unless they see -- well, I 24 don't -- I'm not -- I don't know exactly their practice, 25 but what we -- the arrangement that we have and what</p> | <p style="text-align: right;">Page 45</p> <p>1 in those situations. 2 Q. And when -- when you were asked if they needed to 3 do anything, what was your response? 4 A. I don't recall. 5 Q. Did you take -- tell the -- ask the police to 6 take any action when they asked if you needed to do 7 anything? 8 A. I did not. Not to my recollection. 9 Q. When they asked if you were okay, did you respond 10 that you were not okay? 11 A. I told them that -- that that was weird. And I 12 felt sorry for Will and Sandy. I was -- I was hurting 13 for them. And -- and I -- so a part of my posture was 14 more like, "Wow, I don't know how to help them. I feel 15 so badly for them." The other part was, "Man, that was 16 uncomfortable." 17 And -- and I hoped that somehow they wouldn't -- 18 they would figure out a way to manage the intensity of 19 emotion that they were dealing with, but I also -- 20 again, these were friends and -- well, not friends. 21 Acquaintances is probably a better term. And I -- I 22 didn't want to make more of it than it was, but -- so 23 that's kind of how I responded and -- and explained to 24 them. 25 Q. Did you ask the church -- the -- strike that.</p> |

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1 Did you ask the police officers who worked at the
 2 church to take any special measures related to
 3 Dr. McRaney going forward?
 4 A. No, I did not.
 5 Q. Okay. Did the police write up any report about
 6 this interaction that you've been discussing?
 7 A. Not to my knowledge.
 8 Q. Did you or anyone else, to your knowledge, write
 9 up any report or description of the communication that
 10 you had been discussing?
 11 A. Not to my knowledge.
 12 Q. Okay. And what was it that Dr. McRaney was
 13 saying to you that made you feel uncomfortable?
 14 A. It wasn't the -- what he was saying. It was the
 15 way he was saying it. The intensity that was in my
 16 space. Sandy was particularly intense a couple of times
 17 in it, moving closer to me, getting around him, and in
 18 between us. And the best I can recall -- and I'm -- the
 19 best I can recall, they were appealing to me that I was
 20 in a position to take action and I needed to take
 21 action.
 22 Q. They were upset about -- they were upset about
 23 Dr. McRaney's termination by BCMD, correct?
 24 A. As I recall, yes.
 25 Q. And they believed that -- that NAMB had

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1 contributed to that termination, correct?
 2 A. Yes. As I understand it, that was their
 3 contention.
 4 Q. And they were addressing you as a trustee of NAMB
 5 during that conversation, correct?
 6 MR. RAJAVUORI: Object to form.
 7 A. I think as a --
 8 MR. RAJAVUORI: Go ahead, you can answer.
 9 A. I think as a -- again, I don't want to overstate
 10 words, but as an acquaintance or someone who knows them
 11 and in my capacity at NAMB.
 12 BY MR. GANT:
 13 Q. And is it fair to say that they were upset about
 14 Dr. McRaney's termination?
 15 A. Yes, that would be fair to say.
 16 Q. And as a result of that, they were passionate
 17 about what was being discussed; is that fair?
 18 MR. RAJAVUORI: Object to form.
 19 THE WITNESS: Can I answer?
 20 MR. RAJAVUORI: Yes.
 21 MR. GANT: Yes.
 22 A. Yes. Yes. Very -- very emotional and very
 23 passionate.
 24 BY MR. GANT:
 25 Q. Following that interaction, did you ever tell

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1 anybody that Dr. McRaney had threatened you?
 2 A. I did not use the -- to my recollection, I did
 3 not use those terms.
 4 Q. Okay.
 5 A. That term.
 6 Q. Yeah.
 7 And did you feel that Sandy McRaney was a
 8 physical threat during that interaction?
 9 A. I'm not sure of the definition of "physical
 10 threat." Did I -- does that mean I -- I -- I was
 11 uncomfortable with the -- with -- with the closeness and
 12 with the intensity with which she was -- there were
 13 times where I needed to take a step backwards from them,
 14 but I -- I did not -- you know, I didn't feel like I
 15 needed to take cover or run away, but it was
 16 uncomfortable.
 17 Q. Did Dr. McRaney assault you in any way during
 18 that interaction?
 19 MR. RAJAVUORI: Object to form.
 20 A. There is -- there -- there might be a way that I
 21 would say it was a verbal assault, but -- but I'm not --
 22 I'm not sure I would use that strong of a term.
 23 BY MR. GANT:
 24 Q. Okay. Well, I'm talking about a physical
 25 assault. Did -- did he -- did Dr. McRaney physically

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1 assault you in any way or commit a battery?
 2 A. No.
 3 Q. Okay. Did Sandy McRaney?
 4 A. No.
 5 Q. Were -- were -- was Dr. McRaney prohibited from
 6 attending First Orlando after that interaction?
 7 A. No.
 8 Q. Was he put on any kind of probation?
 9 A. No.
 10 Q. Was there -- were the police told to not let him
 11 enter the building?
 12 A. No.
 13 Q. Okay. He had the same rights and privileges as
 14 any other member of the church after that incident,
 15 correct?
 16 A. Yes.
 17 Q. Okay.
 18 A. Well, I need to correct that. I'm not sure if he
 19 was a member at the time, so all the rights and
 20 privileges of a member. If he wasn't a member, probably
 21 not. But having -- having to do with attendance and
 22 being there, there was no restriction on that.
 23 Q. Okay. So nothing about that conversation led you
 24 to put in place any measures that were different than
 25 prior to that interaction, correct?

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1 A. Here at our church? No. That's correct.
 2 Did I answer that correctly?
 3 We did not take any measures here at our church.
 4 Q. Okay. Everything with -- at the church with
 5 respect to Dr. McRaney and his wife was the same before
 6 and after that interaction, correct?
 7 A. That -- yes, that's correct. To my recollection,
 8 that is correct.
 9 Q. And when you said -- you were talking about
 10 several times about being uncomfortable based on
 11 closeness. You're talking about physically how far
 12 apart you were from Dr. McRaney; is that right?
 13 A. That is correct.
 14 Q. Okay. So he was standing closer to you than
 15 you -- than you wanted; is that right?
 16 A. That's correct.
 17 Q. And you stepped backwards to create more space?
 18 A. I -- as I recall, I did, but I can't say for
 19 sure.
 20 Q. Okay. And when you did that, Dr. McRaney didn't
 21 physically move you back closer to him, did he?
 22 A. The specifics of it -- it's -- it's been a long
 23 time, and I don't remember exactly. But it's -- what
 24 it -- as best I can remember, you know, he was intense.
 25 He was a little more intense on a couple of occasions.

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1 And then the conversation at the end was less intense
 2 and -- and, you know -- but there were times in it that
 3 I felt uncomfortable because of the -- you know, he --
 4 he wasn't yelling at me or making a scene, but the
 5 intensity with which he was talking, the intensity of
 6 her comments and interrupting him to -- to make a point
 7 and things like that, and the closeness which they were
 8 made me uncomfortable.
 9 I'm sure there were -- it was a -- I was trying
 10 to be both compassionate and careful at the same time
 11 and -- and so my -- my practice in that is to -- to be
 12 as welcoming and comforting as I can be without being in
 13 an uncomfortable situation. So it was probably a little
 14 bit of back and forth of me stepping back a little bit
 15 or giving a little room and -- but trying not to make it
 16 obvious or, you know, feel like -- them to feel like I
 17 wasn't listening or wanting to get away from them.
 18 Q. Did you -- after that incident, did you send an
 19 email or otherwise communicate with anyone from NAMB
 20 about the incident?
 21 A. From my recollection, I did.
 22 Q. With whom?
 23 A. I don't recall, but I think it was with Kevin.
 24 But it -- it could be --
 25 Q. (Unintelligible.)

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1 A. Yeah. It could be that I -- I spoke to one of
 2 the officers or somebody that I was closer to, but I
 3 don't recall.
 4 Q. By "officer," do you mean another member of the
 5 board?
 6 A. Yes, sir, one of the officers of the board. It
 7 could have been. I'm not positive.
 8 Q. Okay. So you're not sure who you spoke to. So
 9 do you remember how you communicated with that person?
 10 Was it in writing or by phone or something else? Text?
 11 A. I do not recall. I think I had it in a phone
 12 call, but --
 13 Q. You're not --
 14 A. -- I don't want to swear to it, because I'm
 15 not -- my memory is not perfect on that, and I don't
 16 recall.
 17 Q. So you're not sure with whom you communicated or
 18 how; is that fair?
 19 A. That is fair.
 20 Q. Are you even certain that you did communicate
 21 with anyone about the incident afterwards, or you're not
 22 sure about that, either?
 23 A. I did communicate -- I did communicate with --
 24 with peo- -- with someone or someones at NAMB.
 25 Q. Okay. And what do you recall about that

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1 communication?
 2 A. I recall a quick description of the McRaneys
 3 being very upset and -- and it was an uncomfortable,
 4 awkward conversation. They weren't particularly mad at
 5 me, but their intensity bled over into the conversation
 6 with me. And that I was concerned for Kevin's safety
 7 if -- and that we should make sure we're taking steps to
 8 be careful and just avoid contact and -- and hopefully,
 9 their intensity will lessen and -- and, you know, this
 10 would be short-lived. But right now, they're really
 11 intense, really hurt, and -- and -- and be careful.
 12 Something to that effect.
 13 Q. Why were you concerned for Kevin's safety based
 14 on that interaction you've described?
 15 A. Why? I think part of that would be that I'm --
 16 because I'm aware -- I'm somewhat aware that employment
 17 gone wrong is -- is a -- it can oftentimes cause people
 18 to do really harmful things to other people and -- and
 19 so there's a caution that goes with those kind of
 20 things. And I was just concerned that -- I was
 21 concerned that something might accidentally escalate if
 22 there was an interaction between the McRaneys and Kevin.
 23 And -- and it -- you know, with the intensity that I saw
 24 in them, I was worried. It was -- it was -- because
 25 they weren't mad at me. I didn't sense that they were

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1 mad at me.
 2 They were -- they were mad, though. And if they
 3 got to the person they were mad at, I was concerned for
 4 how they would -- what would happen. How would they
 5 respond in that -- if -- if -- yeah. So that's why I
 6 said it's -- be careful.
 7 Q. But Dr. McRaney did not threaten Kevin Ezell
 8 during the interaction you had with him that you've been
 9 discussing, did he?
 10 MR. RAJAVUORI: Object to form.
 11 A. He -- he did not -- he did not say anything that
 12 indicated he was threatening them -- threatening him.
 13 Excuse me.
 14 BY MR. GANT:
 15 Q. Would you agree that accusing someone of being a
 16 risk of physical harm is a serious accusation that
 17 shouldn't be made lightly?
 18 MR. RAJAVUORI: Object to form.
 19 A. Yeah, I -- I would agree with that.
 20 BY MR. GANT:
 21 Q. Would you agree that characterizing someone as a
 22 physical threat to the wellbeing of another could harm
 23 that person's reputation?
 24 MR. RAJAVUORI: Object to form.
 25

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1 BY MR. GANT:
 2 Q. That is the reputation of the -- the person who
 3 is supposedly the threat.
 4 A. I'm sorry. Would you ask the question again for
 5 me.
 6 Q. Sure.
 7 Would you agree with me that accusing someone of
 8 being a risk of physical threat to others is a serious
 9 accusation?
 10 A. Yes.
 11 MR. RAJAVUORI: Object to form.
 12 BY MR. GANT:
 13 Q. And that accusation could -- could harm the
 14 reputation of the person who is being accused of being
 15 the risk, correct?
 16 MR. RAJAVUORI: Same objection.
 17 A. Yes, I -- I agree that that could do that --
 18 BY MR. GANT:
 19 Q. Okay.
 20 A. -- or risks doing that.
 21 (Unintelligible cross-talk.)
 22 THE VIDEOGRAPHER: I'm sorry to interrupt. I
 23 just want to check. Do you still need Exhibit 2 on
 24 the screen?
 25 MR. GANT: No. Let's -- I was actually going

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1 to call up a different one. So let's bring up Tab 6,
 2 please.
 3 MR. RAJAVUORI: I don't want to stop your
 4 questioning here, but can we take a break at some
 5 point in the near future?
 6 MR. GANT: You want to take it now, or do you
 7 want to go five or ten minutes more and then take it?
 8 It's your -- do you have a preference, Dr. Armas?
 9 You want to take one now. I mean, Dr. --
 10 THE WITNESS: I would like -- that's okay. You
 11 just promoted me. But I would like to take a break
 12 now.
 13 MR. GANT: Okay. Let's take it, and we'll
 14 bring the -- so don't put up the tab. We'll bring it
 15 when we reconvene.
 16 THE VIDEOGRAPHER: Okay. The time is 11:27.
 17 We are going off the video record. This concludes
 18 Media Unit 1.
 19 (Whereupon, a break was taken from 11:27 a.m.
 20 to 11:38 a.m.)
 21 THE VIDEOGRAPHER: The time is 11:38. We are
 22 on the video record. This begins Media Unit 2.
 23 BY MR. GANT:
 24 Q. Welcome back from the break. Did you speak or
 25 communicate with anyone during the break?

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1 A. Yes.
 2 Q. With whom?
 3 A. With Derek.
 4 Q. By what means?
 5 A. Phone call.
 6 Q. And who called whom?
 7 A. He called me.
 8 Q. And did he -- strike that.
 9 Did you discuss any of the questions or answers
 10 that you gave earlier today to my --
 11 MR. RAJAVUORI: I'm going to object to that.
 12 Privilege objection.
 13 Don't answer, Danny.
 14 BY MR. GANT:
 15 Q. Are you going to follow that instruction?
 16 A. Yes.
 17 Q. Okay. So Derek called you to provide you
 18 feedback about some of the questions that I've asked or
 19 testimony that you've provided; is that right?
 20 MR. RAJAVUORI: Same objection.
 21 BY MR. GANT:
 22 Q. Are you going to refuse to answer?
 23 A. I refuse to answer.
 24 Q. Okay. Were the responses you gave to my
 25 questions this morning truthful and complete?

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1 for today's deposition?
 2 A. No.
 3 Q. Okay. And where are you physically conducting
 4 the deposition from?
 5 A. I'm in my office.
 6 Q. At First Orlando?
 7 A. At -- at First Baptist Orlando.
 8 Q. And do you have any material related to the
 9 deposition in your office other than that one note you
 10 took?
 11 A. I don't think so. I may have a calendar invite
 12 or the Zoom info on a page, but I don't -- I don't -- I
 13 don't think I do.
 14 Q. Okay. Nothing substantive?
 15 A. Some -- sometimes my calendar's printed out. It
 16 could be on there, but nothing about -- no -- nothing
 17 substantive.
 18 MR. GANT: Okay. All right. Let's go off the
 19 record to discuss a lunch break.
 20 THE VIDEOGRAPHER: Time is 12:47. Going off
 21 the video record. This concludes Media Unit 2.
 22 (Whereupon, a break was taken from 12:47 p.m.
 23 to 1:19 p.m.)
 24 THE VIDEOGRAPHER: The time is 1:19. We are on
 25 the video record. This begins Media Unit 3.

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1 BY MR. GANT:
 2 Q. Okay. I hope you had a nice lunch break.
 3 Did you speak or communicate with counsel for
 4 NAMB during the break?
 5 A. No.
 6 Q. Okay. Did you communicate with anyone about
 7 anything related to the substance of the deposition or
 8 the questions or answers during the lunch break?
 9 A. No.
 10 Q. Okay. You'll recall before the lunch break, we
 11 looked at Exhibit 3, which was the photo of Dr. McRaney
 12 posted at the NAMB security desk. And then we looked at
 13 Exhibit 4, which was Tom Wigginton's document reflecting
 14 his posting of that photo, stating, as a subject line,
 15 "Will McRaney picture at lobby desk -- no entry in
 16 building."
 17 Do you recall that?
 18 A. I do.
 19 Q. Do you know how long Dr. McRaney's photo was left
 20 up at the security desk at NAMB headquarters?
 21 A. No, I do not.
 22 Q. You testified earlier that at some point, someone
 23 from NAMB made you aware that the photo was up at the
 24 security desk at NAMB headquarters, correct?
 25 MR. RAJAVUORI: Object to form.

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1 A. I -- when you say "from NAMB," it could've been
 2 somebody that's not an employee, but it was either a
 3 trustee or an employee, yes.
 4 BY MR. GANT:
 5 Q. Well, when I say "from NAMB," I'm including
 6 trustees.
 7 A. Okay.
 8 Q. So now you understand my question, do you have --
 9 do you have an answer?
 10 A. Yes.
 11 Q. Okay. At the time whoever from NAMB made you
 12 aware that the photo of Dr. McRaney had been posted at
 13 the security desk at NAMB headquarters, did you register
 14 any disagreement or request that the photo be removed?
 15 A. No.
 16 Q. Are you aware of anyone from NAMB who at any time
 17 registered any disagreement with the posting of
 18 Dr. McRaney's photo at the NAMB security desk?
 19 A. No.
 20 Q. Now, Mr. Wigginton's note about posting the photo
 21 said no -- no entry in building. Are you aware of
 22 anyone else other than Dr. McRaney whose photo was
 23 posted at the NAMB security desk for the purpose of,
 24 quote, "no entry in building," closed quote?
 25 A. I'm not.

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1 MR. GANT: Let's bring up, please, Tab
 2 Number 1. And I believe we're up to Exhibit 9, so
 3 we'll mark this as Exhibit 9.
 4 (Whereupon, Plaintiff Exhibit 9 was marked for
 5 identification.)
 6 BY MR. GANT:
 7 Q. This does not have Bates numbers, but I'll
 8 represent to you this is a -- a brief filed with the
 9 United States Court of Appeals for the Fifth Circuit on
 10 August 20, 2020. Do you see that on the cover, that it
 11 says United States Court of Appeals for the Fifth
 12 Circuit? On the top, it has the date August 20, 2020.
 13 A. I'm trying to find the date. Oh, I see it. Yes,
 14 that's correct.
 15 Q. Okay. And what -- were you the chairman of the
 16 board of NAMB at the time?
 17 A. I believe I was.
 18 Q. I understand you haven't looked at the whole
 19 brief. I don't think you'll want or need to look at the
 20 whole brief to answer my questions, but of course
 21 you're -- you're free to.
 22 But without reviewing the document, do you
 23 believe that you've ever reviewed a brief by this title
 24 filed on that date?
 25 A. I do not believe I have. At least not in its --

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1 not in its entirety.
 2 Q. Okay. At some point, did you become aware
 3 that -- strike that.
 4 The ERLC, the Ethics and Religious Liberty
 5 Commission, are you familiar with that?
 6 A. I am.
 7 Q. That is an agency of the Southern Baptist
 8 Convention, correct?
 9 A. That is correct.
 10 Q. As is NAMB, correct?
 11 A. That is correct.
 12 Q. So NAMB and ERLC, are sister agencies of the
 13 Southern Baptist Convention, correct?
 14 A. As I understand, that's correct.
 15 Q. Okay. At some point, did you become aware that
 16 ERLC had filed a brief in the United States Court of
 17 Appeals for the Fifth Circuit in support of NAMB as set
 18 forth on the cover of this exhibit?
 19 A. I do remember hearing that.
 20 Q. Do you remember when you learned that?
 21 A. I do not remember when.
 22 Q. Okay. Do you know whether you became aware of
 23 it -- strike that.
 24 Did you become aware at some point that there
 25 were some inaccurate statements made by the ERLC and

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1 Thomas More Society in this amicus brief that is marked
 2 as Exhibit 9?
 3 MR. RAJAVUORI: Object to form.
 4 A. I seem to remember there was some discrepancy,
 5 but I -- I -- I'm not sure that I would have known to
 6 describe it the way you're describing it. But there
 7 was -- it seems like I remember there was a lot of --
 8 there were a lot of opinions and controversy or whatever
 9 about the -- the ERLC brief.
 10 BY MR. GANT:
 11 Q. Do you remember anything else about that
 12 controversy?
 13 A. Not specifically.
 14 Q. Okay. Do you know whether or not there was ever
 15 a correction of the ERLC brief, marked as Exhibit 9,
 16 filed with the United States Court of Appeals for the
 17 Fifth Circuit?
 18 A. I do not.
 19 Q. Okay.
 20 A. There is none that I know of.
 21 Q. You were not aware of a correction being filed?
 22 A. I'm not aware of a correction being filed.
 23 MR. GANT: Okay. All right. Let's bring up
 24 Tab 8, please, and mark that as Exhibit 10.
 25 (Whereupon, Plaintiff Exhibit 10 was marked for

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1 identification.)
 2 BY MR. GANT:
 3 Q. This was Bates Number ERLC 86 through 90. I will
 4 represent to you the -- the first page is what's called
 5 the -- the notice of electronic filing. When you file a
 6 document in court these days, you usually do it
 7 electronically, and it generates an automatic response.
 8 So the first page indicates what was filed and when.
 9 If you look in the middle of the page, do you see
 10 it says "Docket Text"?
 11 A. I do.
 12 Q. And it says "Letter Files," and then on the
 13 second line, it says, "Requesting guidance on correcting
 14 brief amici curiae."
 15 Do you see that?
 16 A. I do.
 17 Q. And then after that, it says, "Date of service:
 18 December 14, 2020."
 19 Do you see that?
 20 A. Yes.
 21 Q. Okay. And you see above the docket text, it says
 22 "Notice of Docket Activity." And it also indicates
 23 December 14, 2020, as the date of this docket activity?
 24 A. Yes.
 25 Q. Okay. And if we turn to the next page, which is

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1 Bates-labeled ERLC 88, there's a three-page letter. Why
 2 don't you look through that, and then let me know when
 3 you're ready for a question, please.
 4 A. Next page, please.
 5 Next page, please.
 6 Is there another? Is there a fourth page?
 7 Q. That's it.
 8 A. Okay.
 9 Q. That's the end.
 10 Have you had a chance to fully review the letter?
 11 A. Yes, sir.
 12 Q. Having done so, do you believe you've ever seen
 13 it before?
 14 A. I don't believe I have.
 15 Q. The subject of the letter is the amicus brief
 16 that was marked as Exhibit 9. You understand that the
 17 amicus brief at issue was filed by ERLC and the Thomas
 18 More Society in support of NAMB's case against
 19 Dr. McRaney, correct?
 20 A. Yes, that's correct.
 21 MR. RAJAVUORI: Object to form.
 22 BY MR. GANT:
 23 Q. And at the -- at the time, you were chairman of
 24 the board of the trustees of NAMB, correct?
 25 A. I believe that is correct.

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1 researched something. I can't remember if I knew the
 2 name or some parts of it and -- so that was part of it.
 3 I think that would probably be the only part
 4 called research. The rest was just me writing it from
 5 bits and pieces of drafts that others had provided.
 6 Q. The quote from Judge Ho, did you supply that, or
 7 someone else did?
 8 A. I don't recall.
 9 Q. Okay. Do you know who Judge Ho is?
 10 A. I do not.
 11 Q. Do you know what you were quoting?
 12 A. You mean what document or speech I was quoting?
 13 I do not, no.
 14 Q. Okay.
 15 A. No.
 16 Q. Do you know if Judge Ho wrote an opinion in
 17 connection with the denial of the petition for rehearing
 18 NAMB filed that was supported by the amicus brief from
 19 the ERLC that contained factual errors?
 20 MR. RAJAVUORI: Object to form.
 21 A. I did not know that.
 22 BY MR. GANT:
 23 Q. Do you know whether Judge Ho specifically relied
 24 on any of the factual inaccuracies in the ERLC brief
 25 that went uncorrected before...

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1 MR. RAJAVUORI: Object to form.
 2 A. I would doubt that, because they were not
 3 material.
 4 BY MR. GANT:
 5 Q. Well, that would --
 6 A. I would hope that the judge is quoting based on
 7 material in that brief, not things that are immaterial.
 8 Q. Well, when you say they were not material, I --
 9 are you saying that because the letter from the counsel
 10 who submitted the erroneous brief said that, or you have
 11 some independent basis for -- for asserting that?
 12 A. I'm saying it based on the documents that I read
 13 today.
 14 Q. Okay. So you understand that someone who had
 15 presented a brief that contained factual errors might
 16 have an interest in minimizing by suggesting that, in
 17 their view, they weren't material? Does that make sense
 18 to you that that might be a motivation?
 19 A. It might be.
 20 Q. And we can agree, I think, that the errors were
 21 at least material enough that they warranted the unusual
 22 step of sending a letter correcting them after the --
 23 the petition had already been decided. Do you agree
 24 with that, that they were at least that material?
 25 MR. RAJAVUORI: Object to form.

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1 A. So -- no, actually. What I -- what I believe to
 2 be true is that the pressure ERLC felt to correct what
 3 was immaterial was because our Southern Baptist family
 4 was up in arms about what the ERLC had -- had, you know,
 5 been a part of in stating, because our SBC family knows
 6 that not to be true. And they were appalled at what
 7 ERLC did.
 8 And so to -- to accommodate and satisfy and do
 9 the right thing by SBC, not the courts, ERLC had the
 10 need to -- to, you know, state what they had done and
 11 admit the error. I believe that they had way more
 12 pressure from the SBC family than from the courts, but
 13 I'm unschooled. So I don't know the way your business
 14 works, but I know the pressure I heard. And the
 15 response that I saw was based on the SBC pressure, not
 16 the Court's pressure. So I considered them to be
 17 immaterial to the legal argument. Very material to the
 18 SBC family.
 19 BY MR. GANT:
 20 Q. Okay. But you're not a lawyer, and you don't
 21 know whether the -- the factual inaccuracies in the
 22 amicus brief from the ERLC were material, do you?
 23 A. I am not a lawyer, and I do not know.
 24 Q. In fact, you haven't even read the opinions that
 25 decided the petition for rehearing, have you?

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1 A. I have not.
 2 Q. Okay. So you don't know whether and to what
 3 extent one or more judges relied on the factual
 4 inaccuracies, do you?
 5 MR. RAJAVUORI: Object to form.
 6 A. I do not.
 7 BY MR. GANT:
 8 Q. And when you prepared this letter marked as
 9 Exhibit 18, you didn't know what Joe -- Judge Ho had
 10 written in response to the petition for rehearing and
 11 whether or not he was influenced by the factual errors
 12 in the ERLC brief, do you?
 13 A. I do not.
 14 Q. All right. We can put 17 and 18 aside for now.
 15 Did -- were NAMB personnel also pressuring the
 16 ERLC to send something to the Court correcting the
 17 factual errors in the ERLC amicus brief --
 18 MR. RAJAVUORI: Object to form.
 19 BY MR. GANT:
 20 Q. -- or from the SBC community? Did that include
 21 NAMB?
 22 A. Not that I'm aware of.
 23 Q. So others within what you -- I think you used the
 24 phrase "the SBC community" -- were in an uproar and
 25 pressuring ERLC to submit a correction, but to your

| | |
|--|---|
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| <p>1 knowledge, NAMB was not -- was not making that request?</p> <p>2 A. I want to clarify. I don't -- I don't think most</p> <p>3 SBC pastors -- and that's where the complaints would</p> <p>4 come from -- would be aware that there's such a thing as</p> <p>5 a correction to the brief. I don't think they cared</p> <p>6 about the correction to the brief as much as they cared</p> <p>7 that the ERLC represented it incorrectly.</p> <p>8 And -- and our autonomy is highly valued. And it</p> <p>9 would've been the pastors and congregants in SBC</p> <p>10 churches that -- that's where the energy was from, not</p> <p>11 entities, but from -- our churches would've been the</p> <p>12 ones saying that's -- that they misrepresented who we</p> <p>13 are as a network of churches.</p> <p>14 But I don't know that they would've been saying,</p> <p>15 "Here's the action you need to take," because we pastors</p> <p>16 wouldn't know what action they should take other than to</p> <p>17 correct the mistake, whatever that means.</p> <p>18 Q. The -- one of the paragraphs from</p> <p>19 Professor Hankins that you read said, "The ERLC must</p> <p>20 have known statements to be false at the time it made</p> <p>21 the misrepresentations to the Fifth Circuit."</p> <p>22 You don't disagree with that, do you?</p> <p>23 MR. RAJAVUORI: Object to form.</p> <p>24 A. I actually -- I think -- I think that's an</p> <p>25 overstatement. I mean, I don't want to say it too</p> | <p>1 Summary 1.PDF."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And then if we go down to the first portion of</p> <p>5 the text, starting with, "Dear state" -- "Dear south</p> <p>6 state exec"...</p> <p>7 A. Yes.</p> <p>8 Q. "As to the McRaney case, NAMB is appealing the</p> <p>9 McRaney case to the U.S. Supreme Court. First Liberty</p> <p>10 Institute is representing us pro bono because they</p> <p>11 believe it is so crucial for the courts to confirm that</p> <p>12 ministries are constitutionally protected from</p> <p>13 government interference when it comes to determining</p> <p>14 matters like this."</p> <p>15 Do you see that?</p> <p>16 A. Yeah. I believe you said "crucial." It's</p> <p>17 "critical," but -- yes.</p> <p>18 Q. Oh. Thank you for correcting. It does say</p> <p>19 "critical."</p> <p>20 And the next paragraph says, "I've attached the</p> <p>21 summary that addresses key points of this case."</p> <p>22 Do you see that?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Then let's turn to the third page of the exhibit,</p> <p>25 Page 429. This is a document on NAMB letterhead. It's</p> |
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| <p>1 strongly. I'm not sure that represents everything. I</p> <p>2 actually think it was more unprofessional. I don't</p> <p>3 think that a person with the ERLC, knowing how important</p> <p>4 autonomy is to us, would have knowingly let that go. I</p> <p>5 think it was unprofessional and they didn't read it</p> <p>6 correctly. That's my theory.</p> <p>7 BY MR. GANT:</p> <p>8 Q. If someone looked at the words, the ERLC should</p> <p>9 have known, if they read it --</p> <p>10 A. Yes.</p> <p>11 Q. -- that it was wrong?</p> <p>12 A. Yes. They should have known.</p> <p>13 Q. And that would be obvious to anyone with</p> <p>14 knowledge about Baptist polity, correct?</p> <p>15 A. I believe so.</p> <p>16 MR. GANT: Let's bring up Tab 16 at the next</p> <p>17 exhibit. This is Bates-labeled NAMB 009427 through</p> <p>18 31.</p> <p>19 (Whereupon, Plaintiff Exhibit 19 was marked for</p> <p>20 identification.)</p> <p>21 BY MR. GANT:</p> <p>22 Q. The cover page, the one you have on your screen,</p> <p>23 is an email from Mike Ebert. The subject is "NAMB</p> <p>24 Student Evangelism Grants and Other Updates," and it</p> <p>25 says there's an attachment entitled "NAMB Supreme Court</p> | <p>1 three pages. As always, you can review as much of it as</p> <p>2 you'd like at whatever pace, but the first thing I'm</p> <p>3 going to ask you is if you recognize this. And then</p> <p>4 we're on Page 9429.</p> <p>5 A. Okay.</p> <p>6 Q. I'm going to put you on mute for one second.</p> <p>7 All right. You said you finished reading it or</p> <p>8 you read the first page or...</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. And then you can read as much as you like.</p> <p>11 Do you recognize this document?</p> <p>12 A. I -- I mean, I recognize the part where it quotes</p> <p>13 me, but I don't recognize the entire document.</p> <p>14 Q. Okay. Did you write this document?</p> <p>15 A. I don't think so.</p> <p>16 Q. Okay. The first page of the portion that we're</p> <p>17 looking at on Page 9429 says in the introduction, "This</p> <p>18 document addresses some questions that may arise in</p> <p>19 connection with NAMB's recent Supreme Court filings. We</p> <p>20 urge you to review the filings themselves."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Did you actually, yourself, review NAMB's</p> <p>24 petition to the U.S. Supreme Court?</p> <p>25 A. I -- parts of it, yes.</p> |

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1 copying a number of other people, correct?
 2 A. Yes.
 3 Q. And the subject line of Dr. McRaney's email to
 4 you is "Correction Request"; is that right?
 5 A. Right.
 6 Q. And you read this email. And in it, Dr. McRaney
 7 was reporting that he had heard that you had told
 8 someone that Dr. McRaney had, quote, "not done the
 9 biblical thing and refused to move," correct? Correct
 10 meaning --
 11 A. Yes.
 12 Q. -- that's what it says, right?
 13 A. That's what it says.
 14 Q. Do you remember telling anyone that Dr. McRaney
 15 refused to leave or refused to engage in Matthew
 16 18-style resolution 18-style resolution?
 17 MR. RAJAVUORI: Object to form.
 18 A. Not specifically, but I -- it's likely or
 19 possible that I would have said that.
 20 BY MR. GANT:
 21 Q. You don't have any basis to dispute the accuracy
 22 of what Dr. McRaney recounted in this email, do you?
 23 A. No.
 24 Q. Okay. You may have told people that, but you
 25 just don't recall; is that right?

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1 A. Right.
 2 Q. Right.
 3 A. I think it would've actually -- I think it
 4 would've been broader than that. Like, he wasn't
 5 willing to meet without these stipulations or these
 6 things or making it complicated or -- you know, not in a
 7 restorative way, I think, is more accurate to what I
 8 said, but the -- I did insinuate that he has been
 9 unwilling to come to the table in a way that we felt
 10 like was -- that would give us an opportunity to restore
 11 and, you know, reconcile.
 12 Q. And -- and whatever information you had or
 13 thought you had about Dr. McRaney's willingness to
 14 engage in Matthew 18-style resolution 18-style
 15 resolution, that came from other people, right? He
 16 never said to you, "I won't do that," did he?
 17 MR. RAJAVUORI: Object to form.
 18 A. He never said those words, but the one time I
 19 tried to create conversation, it was with more
 20 stipulations than -- than could be overcome to begin a
 21 conversation. So I experienced it myself in one case,
 22 but that -- I'm not sure of the timing, was it before or
 23 after -- you know, before or after this email.
 24 BY MR. GANT:
 25 Q. You don't remember when that conversation was

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1 that you're referring to?
 2 A. I don't.
 3 Q. And was it in person or by phone or some other
 4 means?
 5 A. Some of both.
 6 Q. Now, if you could look at the penultimate
 7 paragraph of this email -- so the one that begins,
 8 "While I remain."
 9 Dr. McRaney wrote to you in this email, "While I
 10 remain open to a resolution outside the courts via
 11 biblical restitution, we will press forward in pursuit
 12 of our own course since we have no hierarchy, legal
 13 justice."
 14 Do you see that?
 15 A. Yes.
 16 Q. So Dr. McRaney here was reiterating a willingness
 17 to engage in biblical restitution attempts, correct?
 18 MR. RAJAVUORI: Object to form.
 19 A. That -- that's what he states.
 20 BY MR. GANT:
 21 Q. Okay. And at least from his perspective, when he
 22 said, "I remain open," what he was conveying was that he
 23 had previously been open to pursuing resolution through
 24 biblical restitution or reconciliation, correct?
 25 MR. RAJAVUORI: Objection; form.

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1 A. That -- that is what he's stating, but that's not
 2 what I experienced.
 3 BY MR. GANT:
 4 Q. Okay. But -- but that -- do you have any reason
 5 to doubt that he earnestly believed what he wrote?
 6 MR. RAJAVUORI: Objection to form.
 7 A. I am -- I do believe he believes it. I believe
 8 that's part of the challenge we're facing.
 9 BY MR. GANT:
 10 Q. Okay.
 11 A. But just because he believes it doesn't mean it's
 12 true. But I do believe he believes it.
 13 Q. Okay. That's clear. And I appreciate that.
 14 Do you personally hold a view that Dr. McRaney is
 15 a liar?
 16 A. I don't know.
 17 MR. GANT: Let's turn to Tab 30. Pull that up,
 18 please, which will be marked as Exhibit 25.
 19 Bates-labeled WM 02365.
 20 (Whereupon, Plaintiff Exhibit 25 was marked for
 21 identification.)
 22 BY MR. GANT:
 23 Q. Before we get to that, following up on my prior
 24 question, you hesitated for a long time when I asked my
 25 question. Would you agree with me that calling someone

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1 a liar or saying they lie is a serious accusation?
 2 MR. RAJAVUORI: Object to form.
 3 A. Yes, which is why I paused.
 4 BY MR. GANT:
 5 Q. I -- I -- that was my guess about why you were
 6 pausing.
 7 So we're in agreement about the seriousness of
 8 that allegation. You wouldn't make that accusation of
 9 someone lightly, would you?
 10 MR. RAJAVUORI: Object to form.
 11 A. I would hope I wouldn't.
 12 BY MR. GANT:
 13 Q. And would you view it as unchristian to
 14 cavalierly accuse someone of being a liar?
 15 MR. RAJAVUORI: Objection; form.
 16 A. You said in a cavalier way? Did I hear that
 17 correctly?
 18 BY MR. GANT:
 19 Q. Yes.
 20 A. Yeah. Yeah. I would say that was not the way of
 21 Jesus.
 22 Q. And would you agree that if -- if someone you
 23 trusted as a reliable source told you that someone had
 24 lied or was a liar that that would damage your view of
 25 the -- of the -- of the character of the person who was

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1 being accused of that?
 2 A. Certainly.
 3 MR. RAJAVUORI: Objection; form.
 4 BY MR. GANT:
 5 Q. Okay. Let's look at the exhibit we have in front
 6 of us, Exhibit 25. This is a one-page document. Please
 7 take a look at it and let me know when you're ready for
 8 a question.
 9 A. Okay. I am ready.
 10 Q. Have you seen this exhibit before?
 11 A. Yes.
 12 Q. When was the most recent time you saw it?
 13 A. It would have been this week.
 14 Q. This was one of the documents sent to you by
 15 counsel for NAMB to prepare for today's deposition?
 16 A. As I recall, it was.
 17 Q. Okay. And this is an email from Dr. McRaney to
 18 you dated June 1, 2021?
 19 A. Yes, sir.
 20 Q. Do you remember receiving it in June 2021?
 21 A. I do.
 22 Q. Did you respond to it?
 23 A. I don't recall if I did or not.
 24 Q. All right. Tell me if you need to pull it back
 25 up, but I -- I think I forgot to ask that question with

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1 respect to Exhibit 24, the prior email from you --
 2 excuse me -- to you from Dr. McRaney, the correction
 3 request. Did you respond to him? If you want to pull
 4 it back up, we can.
 5 A. I don't think I did.
 6 Q. Okay. Do you remember ever replying to any email
 7 from Dr. McRaney?
 8 A. I don't specifically recall. It's possible I may
 9 have actually called him in response, but I don't recall
 10 if I did or not. I was -- I was concerned about
 11 responding and what would be used against me.
 12 Q. Okay. So you -- you don't think you responded
 13 by -- in writing to any of Dr. McRaney's emails,
 14 correct?
 15 A. I don't think I did.
 16 Q. And you don't know whether you ever called in
 17 response, but you have no specific recollection of doing
 18 so; is that correct?
 19 A. That's correct. I do have -- I do know we had
 20 talked, and I think we talked at least once by phone. I
 21 don't know what the sequence was. Was it before these
 22 or after these. I mean, he's making reference to
 23 conversation in this email, so -- I don't remember the
 24 sequence, so -- but I don't -- and I do recall -- I
 25 think we had one conversation in person and one

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1 conversation on the phone, but --
 2 Q. But you don't know when --
 3 A. I could be proven wrong.
 4 Q. You don't know -- you're not sure you had them,
 5 and you don't know when you had them, if you had them?
 6 A. I do know -- I do know we had a face-to-face
 7 conversation, and I'm almost positive we had a phone
 8 conversation.
 9 Q. Okay. And the face-to-face conversation you're
 10 referring to was not the one that occurred at the church
 11 that we discussed earlier, or it is?
 12 A. It is.
 13 Q. Okay. So -- okay. So you're not --
 14 A. I just don't recall when that was.
 15 Q. Okay. Is it possible that it was December of
 16 2015? Would that work with the rest of --
 17 A. I'm sorry. I'm sorry. I got confused, Scott.
 18 Sorry.
 19 Q. Okay.
 20 A. When you're talking about the conversation that I
 21 referred to earlier where they were intense, that's not
 22 the one I'm referring to.
 23 Q. Okay. The -- the --
 24 A. I apologize.
 25 (Unintelligible cross-talk.)