

**COMMONWEALTH OF KENTUCKY  
FRANKLIN COUNTY CIRCUIT COURT  
DIVISION \_\_\_\_  
21-CI-\_\_\_\_\_**

**HANNAH KATE WILLIAMS**

**PLAINTIFF**

**v.**

**EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION, INC.  
a Tennessee non-profit corporation**

**SERVE:**

**Ronnie W. Floyd  
901 Commerce Street  
Nashville, TN 37202-3600**

**THE SOUTHERN BAPTIST THEOLOGICAL SEMINARY,  
a Kentucky non-profit**

**SERVE:**

**Richard Craig Butler  
2825 Lexington Road  
Louisville, KY 40280**

**LIFEWAY CHRISTIAN RESOURCES OF THE  
SOUTHERN BAPTIST CONVENTION, INC,  
a Georgia non-profit corporation**

**SERVE:**

**Corporation Service Company  
2 Sun Court, Suite 400  
Peachtree Corners, GA 30092**

**JAMES RAY WILLIAMS**

**SERVE:**

**1015 Champion Court  
Frankfort, KY. 40601**

**HERSHAEL YORK**

**SERVE:**

**Address unknown**

**TIMOTHY PIGG**

**SERVE:**

**Address unknown**

**ROD MARTIN**

**SERVE:**

**Address Unknown**

**JARED MOORE**

**SERVE:**

**Address Unknown**

**MIKE STONE**

**SERVE:**

**Address Unknown**

**MATTHEW NOWLIN**

**SERVE:**

**Address Unknown**

**TIM WHITE**

**SERVE:**

**Address Unknown**

**JON MOYERS**

**SERVE:**

**Address Unknown**

**DEFENDANTS**

**VERIFIED COMPLAINT**

\*\*\*.\*\*\*.\*\*\*

The Plaintiff, Hannah Kate Williams, by counsel, for her complaint against the Defendants, after first being duly sworn, states on personal knowledge or to the best of her belief, the following:

## PARTIES

1. The Plaintiff, Hannah Kate Williams, is a citizen and resident of Nashville, Davidson County, Tennessee.

2. The Defendant, Executive Committee of the Southern Baptist Convention, Inc. (“the EC”), is located in Nashville, Davidson County, Tennessee, and is a Tennessee non-profit corporation, formed under the laws of Tennessee in 1928 and is a related or coöperating entity of the Southern Baptist Convention<sup>1</sup> (“SBC”) per the website of the Southern Baptist Convention. <https://www.sbc.net/about/what-we-do/legal-documentation/legal-names/>. The Southern Baptist Convention in its organizing Constitution describes itself and its purpose as a Christian religious denomination. <https://www.sbc.net/about/what-we-do/legal-documentation/constitution/>. The Convention meets annually where it elects a president and other officers, including members of the EC, formulates and debates various policy positions, and deals with the larger issues of the denomination from education to mission. *Id.* The EC is essentially empowered to provide leadership, interface with the public and other denominations, operate the denomination’s business and pursue its purposes on a day-to-day basis. The EC is currently comprised of eighty members elected by the SBC serving four-year staggered terms of which there are Kentucky representative members on the Board. There are three *ex-officio* members: the SBC president, recording secretary and a Baptist seminary president. The EC has its own budget and employees. The EC operates as the “fiduciary, the fiscal, and the executive

---

<sup>1</sup> The Southern Baptist Convention is a Georgia non-profit corporation founded by an act of the Georgia Legislature in 1845. It is governed solely by its denominational adopted Constitution and Bylaws. Unlike any other Georgia non-profit, the SBC seems to uniquely be legally excused from filing articles of incorporation, annual reports or similar filings, and may well be beyond the investigative powers of the Georgia Attorney General and Secretary of State. Regardless, since the actionable conduct here against the Plaintiff has been via “related and coöperating” entitles of the SBC, then there is no need to make the SBC a party defendant though it certainly is from a moral perspective responsible.

entity of the [SBC] in all [the SBC's] affairs not specifically committed to some other board or entity [ ] [and] is specifically authorized, instructed, and commissioned to perform [a serial list of fourteen functions]. *Bylaws of the SBC, #18, "The Executive Committee.* <https://www.sbc.net/about/what-we-do/legal-documentation/bylaws/>.

3. The Defendant, Southern Baptist Theological Seminary, Inc., ("SBTS") is located in Louisville, Jefferson County, Kentucky, is a Kentucky non-profit corporation formed in 1876, and is a related or cooperating entity of the SBC per the website of the Southern Baptist Convention. <https://www.sbc.net/about/what-we-do/legal-documentation/legal-names/>. It is governed by an elected Board of Trustees serving five-year staggered terms composed of State members, Local members and At-Large members along with officers who may or may not be Trustees. The current President is also the President of the Seminary. The SBTS operates a theological seminary on behalf of the Baptist denomination where it educates and trains persons to become parish ministers, missionaries, academics, Christian educators, Christian counselors, and other vocations and professions. It also operates a variety of other services for its staff and students such as dormitories, food services, libraries, IT, school options for home-schooled children of students, day care services, and other such things.

4. The Defendant, LifeWay Christian Resources of the Southern Baptist Convention, Inc., is located in Nashville, Davidson County, Tennessee, is a Georgia non-profit corporation, and is a related or cooperating entity of the Southern Baptist Convention per the website of the Southern Baptist Convention. <https://www.sbc.net/about/what-we-do/legal-documentation/legal-names/>. It is governed by an elected Board of Trustees each serving four year staggered terms with the president of the SBC serving as an *ex officio* member, and of which there are representative Kentucky members on the Board. It operates via elected officers,

has its own budget which it and the SBC approves, and hires its own employees who carries out and performs its tasks and purposes. In its notes to its 2019 Consolidated Financial Statement, LifeWay described its purpose and business, as “LifeWay is a publisher, distributor and retailer of Christian books, literature, and music and is also a provider of church supplies and other Christian products. Products are sold throughout the United States as well as directly to churches, third-party stores and distributors. Revenues are used to support achievement of LifeWay’s mission statement. In January 2019, LifeWay committed to a plan to close its retail store chain and conduct sales exclusively through direct online and third-party channels. A large portion of the business activity of LifeWay is with churches and individuals affiliated with the Southern Baptist Convention. [portions omitted]. <https://www.sbc.net/wp-content/uploads/2020/07/Lifeway-2019-Audit.pdf>. Between 2002 through 2008, LifeWay operated a bookstore on the premises of SBTS.

5. The Defendant, James Ray Williams (“Williams”), is a citizen and resident of Frankfort, Franklin County, Kentucky. He is the biological father of the Plaintiff, and along with his wife and the Plaintiff’s mother, her guardian and custodian until Plaintiff reached the age of sixteen. A Domestic Violence Order was entered against him on October 28, 2020, prohibiting him from having any contact with the Plaintiff including posting any images or messages or content related to her on social media. *Williams v. Williams, 20-D-1279-1, Fayette District Court, Division I, Order (October 28, 2020)*

6. The remaining individual Defendants are all officers or employees or agents of one or more of the corporate Defendants already named herein. The alleged actionable conduct of each of these Defendants herein were in their capacity of agents of the corporate Defendants and their purposes. We have yet to be able to locate residences and addresses of these

Defendants. The Plaintiff will amend her Complaint to add this information as investigation and discovery proceeds. As to each, however, Plaintiff states as follows:

- a. Defendant Hershael York (“York”): upon information and belief, York is a citizen and resident of Jefferson County, Kentucky, and is an employee and faculty member of SBTS;
- b. Defendants Timothy Pigg (“Pigg”); Timothy White (“White”); and Jon Moyers “Moyers”: upon information and belief, Pigg, White and Moyers are former member of the EC;
- c. Defendants Rod Martin (“Martin”) and Mike Stone (“Stone”): upon information and belief, Martin and Stone are current members of the EC; and,
- d. Defendant Mathew Newlin (“Newlin”), upon information and belief, is a former Vice President of the SBC.

#### JURISDICTION & VENUE

7. This is an action based in tort against the Defendants individually and in concert. Jurisdiction is *in personam* premised on either the residence of the Defendant in Kentucky or that the Defendant’s plethora of contacts within the Commonwealth satisfies the constitutional requirements of Kentucky’s Long Arm Statute. *KRS 454.210(2)(a)*.

8. Venue for this action is proper in Franklin County Circuit Court pursuant to KRS 452.460(1).

#### FACTUAL ALLEGATIONS

9. Plaintiff is the eldest daughter of Williams and Regina Williams, born in Knoxville, Tennessee, on May 14, 1995.

10. Williams desired to become a Baptist minister and was working at Mars Hill Baptist Church when he became a student at SBTS in 2002. Williams resided in Louisville while a seminary student and commuted back to Tennessee during the weekend.

11. At some point during the 2002-2003 school year, Williams moved the family to Taylorsville, Kentucky. SBTS arranged for Williams to become a student associate pastor at Elk creek Baptist Church in Taylorsville which allowed the family, including the Plaintiff, to live in the parsonage.

12. LifeWay hired Williams to manage its bookstore at SBTS in 2002 where he worked for the next two years.

13. Many times, Williams took the Plaintiff to school with him. Instead of leaving her at home with her mother and younger siblings or using childcare, he put her by herself in the LifeWay breakroom. She would remain by herself in the breakroom for up eight to ten hours a day. This occurred during the entire three-and-a-half-year period which Williams was employed as the manager at LifeWay, and in view of LifeWay co-workers and SBTS staff and students.

14. During the 2003-2004 school year, SBTS arranged a new student pastorate for Williams at Chapin Fork Baptist Church in Nelson County, Kentucky, and the family moved into an apartment complex owned by SBTS. Along with his employment by LifeWay, SBTS employed Williams directly as night security at the seminary and LifeWay building. Soon after, the family left the apartment and moved to a small rental home in a suburb of Louisville.

15. The first recollection that Plaintiff has of illegal conduct by Williams is around age four or five, her father began physically abusing her as punishment for what he deemed as "misbehavior". This took a variety of forms. A particularly despicable form given that Williams was studying to be a Christian pastor was that he would "baptize" the Plaintiff as a form of

punishment. Williams would fill up the bathtub, place the Plaintiff on her back, and forcibly submerge her while telling her that her "sin" meant she needed to be baptized again. This, and other physical and psychological, abusive conduct continued through the time Plaintiff lived in the home with Williams.

16. On or around May 14, 2003, the Plaintiff was sexually abused by Williams for the first time. The act by Williams included digital penetration of the vagina and cervical canal.

17. The Plaintiff is able to date this first act of sex abuse by Williams, her father, as it occurred during the week of her eighth birthday.

18. From this point until the Plaintiff left the home at the age of sixteen, the physical and sexual abuse inflicted upon her by Williams was ongoing and regular.

19. At the domestic violence hearing held on the petition of the Plaintiff in the Fayette County District Court on October 28, 2020, Williams admitted the truth of all the conduct alleged herein.

20. The Plaintiff first reported the physical and sexual abuse to an employee of SBTS sometime during the summer of 2003 on either a Tuesday or a Thursday. SBTS offered a physical education class at its facility to children of its students who were being homeschooled. The class known as "Kidsfit" was held in the SBTS student recreation center which also had a pool. On the day that Plaintiff reported, the instructor (upon information and belief, an employee of SBTS), was leading the children in some type of aquatic activity. The Plaintiff was there with her brother, and neither child would go into the pool and became upset. When asked why, the Plaintiff responded she did not want to get baptized. The Kidsfit instructor asked what she meant, and Plaintiff described what her father did to them as punishment involved a bathtub and was called baptism. During the questioning, Plaintiff also reported that Williams touched her



“down there”, pointing at her crotch. The instructor gave Plaintiff a hug and promised that would never happen again.

21. To Plaintiff’s knowledge, no investigation or follow up to this reporting was ever undertaken by SBTS, and SBTS nor the instructor even reported the conduct of Williams to the police or any agency of the Commonwealth. Indeed, though Plaintiff continued to attend Kidsfit, she was never in that instructor’s group again.

22. After leaving Louisville, Williams, the Plaintiff, and the Williams family began a somewhat nomadic life spent in and out of church work and other employment. He went first to a church near London, Kentucky, then to Kingston, Tennessee, with other stops in Tennessee, Indiana, Ohio and now he is in Frankfort where he has resided for some time.

23. As Plaintiff grew older and left the house at sixteen, she battled the consequences of ten plus years of physical and sexual abuse. She dealt with serious mental illness, difficulty sustaining employment and pursuing education. Despite this, Plaintiff, as part of her recovery, began to advocate and seek justice. This included accountability from the Southern Baptist denomination for not protecting her, and likely her siblings, from the abuse perpetuated upon her by Williams when it was first reported in 2003 and made worse by allowing him to continue to serve at churches in the denomination.

24. The second attempt to address the horrific conduct of Williams with the SBTS occurred in October 2019, when the Plaintiff was twenty-four. She met with President Albert Moehler, the president of SBTS, her brother, and the SBTS Title XI coordinator for the purpose of seeking some mechanism to hold Williams accountable and protect their other siblings still in the home. Moehler indicated that the matter was not on his radar and was unknown to him in

2003, that he would pray for Hannah, her brother, and the whole family. There was no further contact from Moehler or SBTS.

25. Beginning in 2000 and continuing through the most recent Southern Baptist Convention held in Nashville in June 2021, Plaintiff has engaged in advocacy to demand the denomination and its related institutions such as the Defendants seriously investigate claims of sexual abuse, develop effective policies and procedures to prevent these from occurring in its churches and institutions, and to provide resources to victims.

26. The Plaintiff has not been alone in her advocacy. She has joined with many women and some men who have been victims of such abuse in Baptist churches and institutions by clergy and other employees and agents of the denomination. And, worse, the Convention acting through its institutions such as the Defendant EC, LifeWay and SBTS have ignored this reality and chosen to minimize or ignore it.

27. The Plaintiff has far from acted as a "lone wolf" in telling her story, her truth. She has been supported in her advocacy by other victims and allies. Even so, since her advocacy began, the powers in the Southern Baptist denomination have intentionally and concertedly acted to silence her, lie about her, and deny her truth. These Defendants have engaged in a defamatory conspiracy to marginalize and negate her advocacy in the perverted and un-Christian desperate hope that the denomination can skirt its own culpability in the damage inflicted upon the Plaintiff by her own father, Williams.

28. Just prior to the 2021 SBC Convention held in Nashville, the issue of sex abuse in the SBC had come to a head and had catalyzed with the publication of two letters from Russell Moore, the chair of the SBC's Commission on Ethics & Religious Liberty, sent to J.D. Greear, the then president of the SBC. In the May 31, 2021, letter Moore stated, "You and I both

heard, in closed door meetings, sexual abuse survivors spoken of in terms of ‘Potiphar’s wife’ and other spurious biblical analogies,” Moore wrote to Greear. “The conversations in these closed-door meetings were far worse than anything Southern Baptists knew — or the outside world could report.”

29. Based on the SBC’s own internal document which is likely part of the work of the EC, the denomination via the EC and some of its trustees and officers were actively seeking to quench victims of sexual abuse by clergy, students, employees, etc. of the Denomination.

30. Specifically, these published statements directed towards the Plaintiff in furtherance of this conspiracy to silence her or frame her as a liar, charlatan or crazy person below are defamatory, were made by the speaker Defendant knowingly that it was false or that it was made recklessly without any regard as to whether it was false:

- a. July 12, 2020, York published on Twitter that he had done all he could for the Williams family, there was no reason to report the abuse, and was assured by Williams it would not occur again.
- b. March 12 through July 7, 2020, Martin published multiple times on Twitter stating that Plaintiff was a liar.
- c. June 1, 2020, Moore published on Twitter that Plaintiff was a liar, not a Godly person, and was deranged.
- d. June 14, 2021, Pigg published on Twitter that Plaintiff was a liar and a political operative who made up the abuse to attack Mike Stone.
- e. June 13, 2021, Stone published on Twitter lied about Plaintiff that the abuse was not real as well as in person in front of nearly a hundred people at the

2021 SBC for nearly ten minutes that Plaintiff was a liar, sick, evil and a fraud.

- f. June 15, 2021, Nowlin published on Facebook that Plaintiff was a liar and crazy.
- g. June 17, 2021, White published on Facebook that that Plaintiff was a liar, not handling the allegations like a Christian, and had made up the abuse.
- h. June 17, 2021, Moyers published on Facebook that Plaintiff was a liar, was attacking Mike Stone, and that the abuse allegations were likely untrue.

31. Based upon the Moore-Greear correspondence, the defamatory statements published against the Plaintiff, and the other allegations herein, upon information and belief, there is a high likelihood that the reports made to the SBTS by Plaintiff were part of the discussions alluded to in the Moore-Greear correspondence, that there are other relevant documents and witnesses to the attempts by the corporate Defendants to cover up their “passing along” of Williams to unwitting congregations, and the risk that the other children of the Williams’ family suffered similar abuse. In short it is hard to foresee where discovery may lead in this litigation.

#### CLAIMS FOR RELIEF

##### 1 – Defamation

- 32. The Plaintiff incorporates paragraphs 1 – 31.
- 33. The published statements set forth in paragraph 30 (a) – (h) are false and defamatory.
- 34. The statements are all unprivileged publications to third parties via social media;

35. The Defendants were negligent, or reckless or intentionally malicious in making such defamatory and false statements about the Plaintiff; and,

36. The Plaintiff suffered actual harm and damages because of such false and defamatory statements.

## 2. Civil Conspiracy

37. The Plaintiff incorporates paragraphs 1 – 31.

38. The Defendants EC, SBTS, LifeWay, and all the individual defendants formed a conspiracy to minimize, negate and protect the Baptist denomination from a problem of sexual abuse of minors or other vulnerable populations in its ranks from clergy, students, employees, staff and others with whom the Denomination associated.

39. To this end, these Defendants conspired, jointly, the Plaintiff by initially ignoring her reports of abuse by her father, Williams, and then publicly declaring her reports false when she began to use her victimization by her father, Williams, and the larger Denomination in an advocacy role.

40. The acts of the conspiracy caused the Plaintiff actual harm.

WHEREFORE, for the foregoing reasons, the Plaintiff respectfully demands the following relief from the Defendants jointly and severally:

1. The Plaintiff recover compensatory damages in an amount in excess of the jurisdictional minimum of this Court;
2. The Plaintiff recover punitive damages in an amount to be assessed by a jury upon proof of recklessness or malice or intentional conduct;
3. The Plaintiff recover her taxable costs;
4. That the case be tried by a jury; and,

5. Any further relief that the Court deem just and proper.

This the 16<sup>th</sup> day of August, 2021



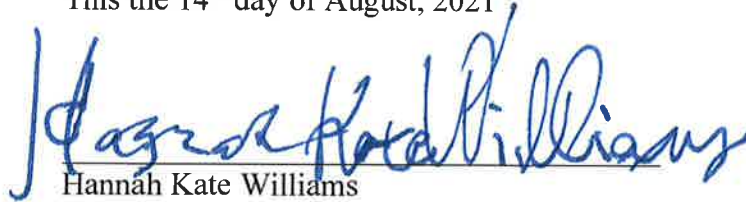
---

Scott White  
Carman Fullerton, PLLC  
111 Church Street  
Lexington, KY. 40507  
859.971-0060  
swhite@carmanfullerton.com

VERIFICATION

I, Hannah Kate Williams, the Plaintiff in this civil action, after first being duly sworn, state that the allegations set forth in the Verified Complaint against the named Defendants are true and accurate or I believe in good faith that the allegations against the Defendants are true and accurate.

This the 14<sup>th</sup> day of August, 2021

  
Hannah Kate Williams

COMMONWEALTH OF KENTUCKY  
COUNTY OF FAYETTE

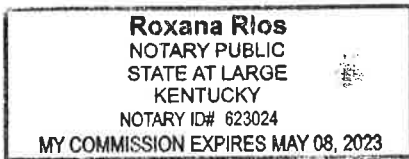
On August 14, 2021, Hannah Kate Williams, appeared before me, swore and affirmed that the statements made in the Verified Complaint against the Defendants were true and accurate or she believed in good faith that the statements against the Defendants were true and accurate.



Roxana Rios, Notary Public

Number: 623024

Expiration: May 8, 2023



Presiding Judge: HON. THOMAS DAWSON WINGATE (648243)

COM : 000015 of 000015