

# EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JOHNNY M. HUNT,	)
	)
Plaintiff,	)
	) C.A. No.
vs.	) 3:23-cv-00243
	)
SOUTHERN BAPTIST CONVENTION;	)
GUIDEPOST SOLUTIONS LLC; and	)
EXECUTIVE COMMITTEE OF THE	)
SOUTHERN BAPTIST CONVENTION,	)
	)
Defendants.	)

HYBRID VIDEOTAPED DEPOSITION OF  
JOHNNY HUNT  
April 18, 2024  
9:01 a.m.

Bradley Arant Boult Cummings LLP

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Atlanta, GA 30309

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JOHNNY HUNT  
April 18, 2024

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1 HYBRID VIDEOTAPED DEPOSITION OF

2 JOHNNY M. HUNT

3 April 18, 2024

4 THE VIDEOGRAPHER: We are now on the  
5 record. This begins Videotape Number 1 in the  
6 deposition of Johnny M. Hunt in the matter of  
7 Johnny M. Hunt versus Southern Baptist  
8 Convention, et al., filed in the United States  
9 District Court for the Middle District of  
10 Tennessee, Nashville Division.

11 Today's date is April 18th, 2024. The time  
12 is approximately 9:01 a.m. This deposition is  
13 being taken at Bradley -- the offices of Bradley  
14 Arant Boult Cummings, LLP, at Atlanta, Georgia  
15 at the request of the same firm.

16 The videographer is Safaa Sammander of  
17 Magna Legal Services. The court reporter is  
18 Robin Ferrill, also of Magna Legal Services.

19 Will counsel please introduce yourselves  
20 for the record, after which the court reporter  
21 will swear in the witness.

22 MR. MacGILL: Rob MacGill and Patrick  
23 Sanders, representing Pastor Johnny Hunt, the  
24 plaintiff in this case.

25 MS. NOKES: Scarlett Nokes with Bradley

1 Arant Boult Cummings representing the defendant,  
2 Executive Committee of the Southern Baptist  
3 Convention.

4 MR. BESEN: Gene Besen, Bradley Arant,  
5 representing the Executive Committee of the  
6 Southern Baptist Convention.

7 MS. CALLAS: Gretchen Callas with Jackson  
8 Kelly, representing the Executive Committee of  
9 the Southern Baptist Convention.

10 MR. McCORMICK: Terrence McCormick of the  
11 firm of Mintz & Gold representing Guidepost  
12 Solutions.

13 MR. KLEIN: And Scott Klein, also from  
14 Mintz & Gold, representing Guidepost Solutions.

15 JOHNNY M. HUNT,

16 called as a witness, having been duly sworn  
17 by a Notary Public, was examined and testified as  
18 follows:

19 EXAMINATION

20 BY MS. NOKES:

21 Q. Good morning.

22 A. Good morning.

23 Q. You heard me introduce myself as Scarlett  
24 Nokes. I represent the Executive Committee along  
25 with Mr. Besen and Ms. Callas, and other than briefly

1 meeting you in the hallway just a few minutes ago,  
2 you and I have never met before today, correct?

3 A. Correct.

4 Q. And the same is true of my co-counsel?

5 A. I don't think I have met him.

6 Q. And what is your full name?

7 A. Johnny Marshall Hunt.

8 Q. What's your date of birth?

9 A. 7/17/52.

10 Q. Have you ever gone by a different name?

11 A. Never.

12 Q. Have any nicknames?

13 A. None.

14 Q. Have you been deposed before today?

15 A. Never.

16 Q. Mr. McGill might have told you there are  
17 several ground rules. I'm going to cover some of  
18 those in an effort to hopefully help today go  
19 smoother.

20 First of all, you took an oath just now  
21 that the court reporter administered and you  
22 understand that you have an obligation to tell the  
23 truth?

24 A. Absolutely.

25 Q. And unlike when you talked to the Guidepost

1 investigators back in 2022, in addition to a moral  
2 and ethical obligation to tell the truth, there's  
3 also a legal obligation in this setting to tell the  
4 truth.

5 A. I understand.

6 Q. If you don't understand any questions I  
7 ask, let me know. Give truthful and complete  
8 answers. Let me know if during the deposition  
9 anything changes about any of your answers.

10 A. Okay.

11 Q. Could be as simple as a date. Could be  
12 something more substantive. But you can always come  
13 back and say, You know, what I said earlier, I need  
14 to change and give you different information.

15 A. Okay.

16 Q. Don't interrupt. That's usually more of a  
17 problem for the lawyers than the witness. But it  
18 will happen.

19 A. I totally agree.

20 Q. It will help things go more smoothly if we  
21 all don't interrupt each other. It's tempting in  
22 conversation, right, to give nonverbal answers --

23 A. Right, uh-huh.

24 Q. -- head nodding?

25 For this proceeding, you have to, in

1 addition -- it's fine to nod. You have to give a  
2 verbal answer along with it.

3 We will take lots of breaks, typically  
4 about every hour or so.

5 A. Okay.

6 Q. If you need a break and we haven't taken  
7 one, let us know. If there's not a question pending  
8 waiting for an answer, I'm happy to accommodate that.  
9 And if you need something clarified, just ask for  
10 clarification --

11 A. Okay.

12 Q. -- at any point.

13 Does all of that sound good?

14 A. Very good.

15 MR. KLEIN: Before you continue, I just  
16 received a text that they're not getting audio  
17 on the Zoom. I don't know if that's anything  
18 that may be my colleagues' issue or if it's on  
19 your side here. Is there anything you can  
20 check?

21 THE VIDEOGRAPHER: Do you want to go off  
22 the record?

23 The time is 9:05 a.m. Going off the video  
24 record.

25 MR. KLEIN: Sorry about that.



1 (WHEREUPON, a recess was taken.)

2 THE VIDEOGRAPHER: We are back on the  
3 record. The time is 9:08 a.m.

4 Q. (By Ms. Nokes) Mr. Hunt, are you taking any  
5 medication today that could impair your ability to  
6 remember or answer truthfully?

7 A. No, ma'am.

8 Q. And is there anything else that might  
9 impact your ability to testify truthfully?

10 A. Nothing.

11 Q. Truthfully or accurately?

12 A. Nothing.

13 Q. What did you do to prepare for your  
14 deposition today?

15 A. I read the -- reread the interrogatories  
16 and I read the Complaint.

17 Q. I don't want to get into the substance of  
18 conversations you might have had with your lawyers,  
19 but did you meet with your lawyers to prepare?

20 A. I did.

21 Q. How many times?

22 A. Last night for about an hour and this  
23 morning for probably 30 minutes.

24 Q. Okay. Were those meetings in person?

25 A. In person, yes, ma'am.

1 Q. Was anyone else present?

2 A. My wife was present last night.

3 Q. And it was Mr. McGill, Mr. Sanders?

4 A. Correct.

5 Q. Anyone else from their firm?

6 A. No, ma'am.

7 Q. Or any other law firm?

8 A. No, ma'am.

9 Q. So just to make sure I understand, two  
10 in-person meetings totaling about an hour and a half?

11 A. Yes, ma'am.

12 Q. Have you spoken to anyone else about this  
13 deposition?

14 A. Just everyone that knows me knows that I'm  
15 in a deposition today. I want to say that's an  
16 exaggeration, but anyone I have talked to.

17 Q. So who are some of those people?

18 A. That would be my family. I have been in a  
19 conference, so I flew in from a conference for the  
20 event. So my children run the conference.

21 Q. That was the Jubilee in Branson?

22 A. Correct. Yes, ma'am.

23 Q. And so you got back from that yesterday?

24 A. Last night. Flew in and came straight in  
25 to meet with my attorneys.

1 Q. Did you fly in to the Atlanta airport?

2 A. Yes, ma'am.

3 Q. It's hectic?

4 A. Very.

5 Q. And what have you said to them about your  
6 deposition and being here today?

7 A. I have waited 23 months for it.

8 Q. You are eager?

9 A. Yes, ma'am.

10 Q. Good.

11 You said you reviewed some of the  
12 pleadings?

13 A. Yes, ma'am.

14 Q. The Complaint.

15 Did you review the Answer?

16 A. Yes, ma'am.

17 Q. Did you review all the discovery responses?

18 A. I did.

19 Q. Did you review any documents?

20 A. No, ma'am.

21 Q. Did you review any of the emails that have  
22 been produced in discovery?

23 A. No, ma'am.

24 Q. Review any text messages?

25 A. Just saw one.

1 Q. What text message was that?

2 A. It was the one that we just received from  
3 North American Mission Board.

4 Q. What about from Roy Blankenship?

5 A. Nothing from Roy.

6 Q. Did you bring any documents with you today?

7 A. No, ma'am.

8 Q. Did you look through the documents that you  
9 produced in this case?

10 A. No, ma'am.

11 Q. And this has been going on for a little  
12 while now.

13 A. Right.

14 Q. Back when discovery requests were issued,  
15 walk me through the process you took to see what  
16 information you had -- whether email, voicemail,  
17 video, text messages -- that were relevant and  
18 responsive to the discovery requests.

19 A. I had changed phones. I no longer had the  
20 computer that was property of North American Mission  
21 Board and even prior to that. So dating back to  
22 2010, it would have been First Baptist Church  
23 Woodstock. So I had no computer. I really am not IT  
24 savvy. So I do 90 percent of my work on the phone.  
25 So my phone was turned over to investigations to see

1 if there were any texts or emails and then they have  
2 my phone again now.

3 Q. And what is it, an iPhone or an Android?

4 A. iPhone, yes, ma'am.

5 Q. Do you use iCloud?

6 A. Yes, ma'am.

7 Q. And when you left your employment at NAMB,  
8 they didn't allow you to keep your NAMB computer?

9 A. I think they gave me the computer, but I  
10 don't use a computer. I used it 99 percent of the  
11 time for Zoom calls during 2020. So I gave it to my  
12 granddaughter.

13 Q. Did you personally look through to see if  
14 you had any responsive text messages?

15 A. I did. And, again, I just -- with them, it  
16 dates back to 2010. And I think I found maybe one  
17 text message.

18 Q. Did you produce that one text message?

19 A. I did.

20 Q. And what about journals? I watched a  
21 sermon you gave somewhat recently. You talked about  
22 keeping a journal on your phone. Is that still your  
23 practice?

24 A. Yes, it's a prayer journal.

25 Q. And did you look through your prayer

1 journal --

2 A. Yes.

3 Q. -- to see if there was anything relevant?

4 A. It's nothing relevant. Still have it, the  
5 same one.

6 Q. Did you review it?

7 A. Yes, ma'am. I review it every day.

8 Q. And, specifically, did you review it in  
9 connection with this litigation?

10 A. Oh, no, ma'am.

11 Q. Where do you currently reside?

12 A. In Panama City Beach -- or really it's  
13 Inlet Beach is the address.

14 Q. And how long have you lived there?

15 A. I have lived in that home since 2020. But  
16 I made it my residence in 2022. But I have lived at  
17 Panama City Beach as far as summer and all of our  
18 getaways for about 20 years.

19 Q. Who lives there with you?

20 A. My wife, Jan.

21 Q. And so you referenced changing your  
22 residence?

23 A. Uh-huh.

24 Q. When did that occur?

25 A. In February of 2022.

1 Q. And what prompted the move?

2 A. We had -- two things, Number 1, we loved  
3 the beach. And after Covid, we realized we were  
4 spending most of our time there. And then secondly,  
5 because of the falsification of the report, it did  
6 such damage in the community I have lived in for 33  
7 years.

8 Q. But you said you changed your residence in  
9 February of 2022?

10 A. Uh-huh.

11 Q. That was prior to the report's publication,  
12 correct?

13 A. Right.

14 Q. So did that prompt the change of residence?

15 A. No, that would have been -- made it really  
16 nice once the report did hit.

17 Q. Do you still spend time here in Georgia as  
18 well?

19 A. Well, it serves more as a hotel as I  
20 travel. Most of my time is on the road.

21 Q. And who lives in Florida with you?

22 A. My wife.

23 Q. And her name is?

24 A. Janet.

25 Q. How long have you been married?

1 A. Fifty-three years.

2 Q. And is she involved in your ministry work?

3 A. Just travels sometime with me. But, no,  
4 she doesn't, she -- for years, but she pretty much  
5 retired when I left the church as far as being  
6 involved in some of the ministries where I train  
7 pastors.

8 Q. Does she still do bookkeeping work and  
9 handling of --

10 A. Does bookkeeping. She handles everything  
11 for Johnny Hunt Ministry. Her dad was an accountant.

12 Q. Does she have training in accounting?

13 A. Just from school.

14 Q. And how many children do you have?

15 A. I have two daughters.

16 Q. What are their names?

17 A. Deanna and Hollie.

18 Q. Last names?

19 A. Deanna Carswell. And Hollie Hixson.

20 Q. How old are they?

21 A. Deanna is 49. And Hollie is 46.

22 Q. And do you provide any financial support to  
23 either of your daughters?

24 A. I could move in with my oldest daughter.

25 And my youngest daughter is married to like a church



1 planner. So I'm a generous person, so I gift them,  
2 but they don't need financial help.

3 Q. Do you employ any of them through your  
4 various business entities?

5 A. No, ma'am. No.

6 Q. And have they been involved in your  
7 ministry work over time?

8 A. Yes. In the early days at Woodstock, we  
9 had an extensive tape ministry, which most of it was  
10 gifting, and I gave that ministry to my oldest  
11 daughter, Deanna. So now it's just a small part of  
12 all of their ministry.

13 Q. And so tapes, how it started, right,  
14 literally cassette tapes?

15 A. Exactly. Cassette tapes.

16 Q. And are these the sermons you now sell on  
17 your website.

18 A. Right, yes.

19 Q. So the tape has evolved -- are they still  
20 CDs or --

21 A. They are CDs. Now they have moved to USBs.

22 Q. Okay. When I looked earlier this week,  
23 your website was down. Are you aware of that?

24 A. Somebody told me that just yesterday, but I  
25 was not aware. So I don't know if they are upgrading

1 or if there's a difficulty. I'm not sure.

2 Q. It's been down the last few days. But you  
3 are still selling your sermons through that website?

4 A. They are -- hardly anybody buys sermons  
5 anymore because you have the Internet. All you've  
6 got to do is go to YouTube or search.

7 Q. How often do you see your children?

8 A. A lot. Now, the oldest daughter, they lead  
9 the largest music tour in the world, Christian music.  
10 And so they have been in 39 cities, so they have just  
11 returned. So I miss seeing them a lot. And then  
12 Hollie comes to the beach a lot. So.

13 Q. And who are their spouses?

14 A. Pete Hixson is married to Hollie. And Jake  
15 Carswell is married to Deanna.

16 Q. And it's the Hixsons who run the concert or  
17 have I got it backwards?

18 A. Carswells.

19 Q. Okay. And how many grandchildren do you  
20 have?

21 A. I have four grandchildren.

22 Q. And what are their ages?

23 A. Katie, which is Deanna's daughter, is 25.  
24 And her son, Carson, is 24. And then Hollie's two  
25 children is Hope -- she's special needs, cerebral

1 palsy -- she's 22; and her sister, Addie, is 20.

2 Q. And how old are you, Mr. Hunt?

3 A. I'm 71.

4 Q. And are you currently employed full time?

5 A. I just do sort of itinerant ministries just  
6 whenever I'm invited.

7 Q. So what are your current income sources?

8 A. I speak a good bit of Sundays. And I have  
9 retirement income from GuideStone. And I have  
10 investments that I draw from.

11 Q. Conferences? Do you get money from  
12 conferences?

13 A. Conference, about the only conferences I  
14 do, because I was removed after the false  
15 allegations. I was removed from basically everything  
16 except for my family and speaking and then a few  
17 friends that want me to come on Sunday.

18 Q. You still do Jubilee, right?

19 A. That's right. They own that.

20 Q. And you do that. And Branson and Myrtle  
21 Beach?

22 A. Correct. And Gatlinburg.

23 Q. How many times a year are those  
24 conferences?

25 A. It's just -- they just do one each of those

1 three places. And there are three conferences a  
2 year.

3 Q. And what about the advanced conferences,  
4 are those still happening?

5 A. The advanced conference is just a gathering  
6 of pastors for -- you know, it's not a fee structured  
7 thing. They just come -- it's more or less  
8 accommodating pastors for round-table discussions.

9 Q. And what about your men's conferences, are  
10 those still happening?

11 A. Yes. They've started again. So I have  
12 been doing a few of those.

13 Q. Did one in 2023, last year?

14 A. I did, yes, ma'am.

15 Q. One or more?

16 A. Last year? I can only think of one. But I  
17 have done five this year.

18 Q. And how many do you have planned for next  
19 year?

20 A. None yet.

21 Q. How many days would you estimate in 2023  
22 that you were booked or on the road for speaking  
23 engagements?

24 A. 2023? Probably 24 Sundays of the year and  
25 then the three conferences.



1 A. About 47 years.

2 Q. And how long do you intend to work?

3 A. As long as I'm able. Retirement is not on  
4 the table. So don't know that I'll make it as long  
5 as Charles Stanley. He went to 88, but.

6 Q. What educational degrees do you have?

7 A. I graduated with a Bachelor's Degree from  
8 Gardner-Webb College, now University, and I have a  
9 Master's Degree from Southeastern Baptist Theological  
10 Seminary.

11 Q. When and where were you ordained?

12 A. I was ordained at Longleaf Baptist Church  
13 in Wilmington, North Carolina in 1979.

14 Q. Who were your personal mentors in your  
15 ministry?

16 A. Adrian Rogers, Jerry Vines, Jimmy Draper.

17 Q. Any others come to mind?

18 A. Charles Stanley. John Edmund Haggai.  
19 Three of those are already in heaven, but anyway.

20 Q. And are there any -- all of those names are  
21 Southern Baptists?

22 A. Yes. Most of my affiliation has been  
23 within the Southern Baptist family.

24 Q. Are there any non-SBC preachers you look up  
25 to?

1           A.     Well, John Edmund Haggai was my Southern  
2 Baptist pastor. He was just a leadership guru. And  
3 John Maxwell.

4           Q.     What about John MacArthur?

5           A.     No. I know him, but he would not be really  
6 a mentor of mine, anyway.

7           Q.     John Pifer?

8           A.     I know him.

9           Q.     There's a lot of biographical information  
10 available about you. So we are not here today to go  
11 through your --

12          A.     I understand.

13          Q.     -- life story. But I would like to skip to  
14 the years around 20-- 2009, 2010 --

15          A.     Okay.

16          Q.     -- and talk about your ministry during that  
17 period.

18                    You were the lead pastor at First Baptist  
19 Church Woodstock at that time, correct?

20          A.     Yes, ma'am.

21          Q.     When did you start in that role?

22          A.     I started the first Sunday in December of  
23 1986.

24          Q.     And how many members, estimated, did  
25 Woodstock have in 2009?

1 A. In 2009, probably 15,000.

2 Q. Was it a single-campus church at that point  
3 in time?

4 A. Yes.

5 Q. Okay. Was the church growing during that  
6 period?

7 A. Yes.

8 Q. When did it experience the most growth?

9 A. The most growth would have been when I  
10 first went there because it was only averaging 180  
11 people. So, and that was in 2000- -- I'm sorry,  
12 1986. So our explosive growth would have been  
13 between '86 and '95.

14 Q. And it grew from the number you said it  
15 was?

16 A. To over 6,000 in attendance on Sundays.

17 Q. Was it considered a "mega church" by 2009?  
18 Was that word even in use in 2009?

19 A. I'm not sure when that word came into use.  
20 But definitely a large church.

21 Q. And your pastoring contributed to all that  
22 growth, correct? Fair to say?

23 A. And a good team around me, so.

24 Q. We talked a little bit about your tape  
25 ministry, but how did you get your messages out in



1 addition to the tape ministry?

2 A. That was basically it until the Internet  
3 came. And then people could watch on Sunday. And I  
4 teach in such a way that I have taught pastors  
5 preaching, so I put outlines there also. So it  
6 became an extremely popular website for pastors  
7 around the world. They could get all of your stuff.

8 Q. And are you talking about your website, the  
9 Johnny Hunt Ministries website or Woodstock?

10 A. No. Woodstock. Woodstock.

11 Q. When did Woodstock start streaming its  
12 services on the Internet?

13 A. Probably soon after -- gosh, I would be  
14 guessing. I don't really remember.

15 Q. You don't recall whether by 2009 it was --

16 A. Oh, in 2009, definitely, it would have been  
17 on by then.

18 Q. It would have been by then?

19 A. Yes, ma'am.

20 Q. Did you keep track or the church keep track  
21 of how many people viewed those live stream?

22 A. We had a media division, so I'm confident  
23 they did.

24 Q. Was it a lucrative time during your  
25 ministry; that era of 2009 to 2010?

1           A.    No, it was a busy time.    You served a  
2   Southern Baptist Convention that doesn't pay.    And  
3   you travel all over the world for the International  
4   Mission Board.    And you attend once a year every  
5   entity of the SBC to be at their trustee meetings and  
6   all.    And plus, I was doing, at that time, three  
7   services a day at Woodstock.

8           Q.    But the church was paying you -- I think  
9   you're referring to your term as SBC president.

10          A.    Yes, yes, which that was in that period of  
11   time.

12          Q.    Right.

13          A.    Nine and '10.

14          Q.    The church was still paying your salary?

15          A.    Yes, of course.

16          Q.    And paid you well?

17          A.    Yes, ma'am.

18          Q.    How was your salary as lead pastor at  
19   Woodstock determined year to year?

20          A.    Personnel committee made those decisions.  
21   I never made a request.    You could check.    There were  
22   probably seven years I refused salary, and you can  
23   also check.    I was probably one of the most generous  
24   givers of the church.

25          Q.    And it fluctuated pretty dramatically.    Do

1 you have any insight into why from one year to the  
2 next it might go up and then the following year go  
3 back down?

4 A. In our giving?

5 Q. In your salary?

6 A. In my salary? I'm not sure. It would be a  
7 good question for my accountant.

8 Q. Would you agree that you have been a mentor  
9 and helped many other pastors to be placed in  
10 pastoral roles at other churches?

11 A. I'm not sure how much I helped them get to  
12 the next place. But I have spent my entire life  
13 mentoring pastors.

14 Q. And some of that was probably formal, some  
15 of it informal?

16 A. Correct.

17 Q. And, Mr. Hunt, your lawyers might have told  
18 you the woman you had the sexual encounter with,  
19 we're not going to use her name here today.

20 A. Okay.

21 Q. We are going to refer to her as Jane Doe.  
22 But if I say that Jane Doe is the woman referenced in  
23 the Guidepost report that you had the sexual  
24 encounter with, you understand who I'm talking about,  
25 correct?

1 A. Yes, ma'am.

2 MR. MacGILL: Counsel, we -- we would  
3 prefer to use Ms. [REDACTED] name. And we will  
4 honor the -- the Court's made it clear that we  
5 are to deal with that in accordance with his  
6 wishes. So we would seal her name, remove her  
7 name in any reference. So you feel welcome to  
8 do that. We are going to file the court order  
9 and we are going to cooperate with the [REDACTED]  
10 but we would encourage you to use her name so  
11 there's no confusion.

12 MS. NOKES: Well, that's why I'm having the  
13 discussion with Mr. Hunt. He's clear on who I  
14 reference when I will say Jane Doe.

15 MR. MacGILL: We don't agree to that. So  
16 Jane Doe is not an appropriate designation for  
17 today's purpose. The Court's made the decision.  
18 We have a controlling order. So we'd ask you to  
19 use [REDACTED] [REDACTED] or [REDACTED] [REDACTED] as the case  
20 may be, and we will protect that name in all  
21 respects, pursuant to the court order, and make  
22 sure that's done properly. But Jane Doe is not  
23 appropriate for many reasons, so we would ask  
24 you not to use it in this deposition proceeding.

25 We have a controlling order where we are

1 still working with counsel for Ms. [REDACTED] We  
2 had hoped to have a document from her today. We  
3 don't have it. So please use her name. Jane  
4 Doe is not appropriate.

5 MS. NOKES: I'm going to continue using  
6 Jane Doe with the understanding that Mr. Hunt  
7 knows who I'm talking about, and if I refer to  
8 Jane Doe's husband, you'll also know who that  
9 individual is, correct?

10 THE WITNESS: I do.

11 Q. (By Ms. Nokes) Okay. And did you mentor  
12 Jane Doe's husband in your ministry?

13 MR. MacGILL: And she's referring to [REDACTED]  
14 [REDACTED] and I'm going to each time make the  
15 mention of the name. We're not going to do  
16 this.

17 MR. BESEN: Listen up. You are not going  
18 to speak over us the whole time. You're not.  
19 Hear me, you are not.

20 MR. MacGILL: I am.

21 MR. BESEN: Your witness has said he knows  
22 who Jane Doe's husband is. The shenanigans and  
23 the BS that you do every deposition aren't going  
24 to be there. Your client is already impressed.  
25 Let's get back to the questions and answers.

1 Your client is eager to testify. Let him  
2 testify.

3 MR. MacGILL: You have made -- you are  
4 making a victim reference by the use of Jane  
5 Doe.

6 MR. BESEN: Jane Doe's anonymity is not --

7 MR. MacGILL: Let me finish my comment.

8 MR. BESEN: We're not doing this.

9 MR. MacGILL: Jane Doe assumes there was  
10 some kind of sexual assault.

11 MR. BESEN: No, it does not.

12 MR. MacGILL: It creates an inference that  
13 is completely inappropriate and you know it.  
14 The truth of all this is going to come out  
15 today. The ridiculous behavior that's involved  
16 in this case, it's going to be brought into  
17 clear focus again today. But we are not going  
18 to agree to a Jane Doe reference. We are not  
19 going to do it. So you can use the name. I'm  
20 going to object each time. Go ahead with your  
21 questions.

22 MR. KLEIN: Rob, if I could just add one  
23 thing. I think I would agree with you, Rob, if  
24 we were suggesting to use the word "survivor" or  
25 "victim." Whether it's appropriate or not, we

1 understand your position with regard to those  
2 words. I do think the term "Jane Doe" doesn't  
3 have the implication that you suggest. I can't  
4 force you to agree with that, Rob, but I would  
5 understand if we were asking to use the other  
6 words I just said. We're not. I think Jane Doe  
7 is pretty generic. Again, Rob, we don't have to  
8 belabor this, but I wanted to distinguish for  
9 you, Rob, the difference that I would agree with  
10 you if Scarlett or I were asking to use those  
11 other phrases, those other terms here today. We  
12 are not.

13 MR. MacGILL: That's fair. So can we  
14 agree, can we all stipulate that the use of the  
15 word "Jane Doe" creates no inference of any kind  
16 or nature. Does everyone agree with that?

17 MR. KLEIN: Yes.

18 MS. NOKES: And I will add, she's not a  
19 party, they are not parties. They are not  
20 seeking monetary damages. It's clearly for  
21 anonymity only.

22 MR. KLEIN: And I would agree with what you  
23 just said, Rob, on the record, as well.

24 MR. MacGILL: Does everyone agree,  
25 Gretchen? You okay with that?

1 MS. CALLAS: Yes.

2 MR. MacGILL: No inference from the use of  
3 the word "Jane Doe."

4 MR. KLEIN: No problem.

5 MR. MacGILL: Thank you. So agreed.

6 MR. KLEIN: Thank you.

7 Q. (By Ms. Nokes) Jane Doe's husband is  
8 someone you mentored through the course of your  
9 ministry?

10 A. No.

11 Q. Not even informally?

12 A. Informally, but that would be thousands of  
13 pastors in a group setting.

14 Q. But you certainly remember him?

15 A. Oh, of course. Absolutely.

16 Q. Are familiar with him?

17 A. Yes.

18 Q. And how did you informally mentor him?

19 A. I do -- for 28 years, I led a Timothy  
20 Barnabus where it averaged 200 pastors in a meeting.  
21 And I spend three days teaching leadership, answering  
22 questions.

23 Q. And that's -- that's how you first met him?

24 A. In that setting, yes.

25 Q. And what about over time, how did the



1 informal mentorship continue?

2 A. He would call or, for the record, his wife  
3 would call on his behalf and ask if I would help him  
4 with his difficulties in his church. So I would meet  
5 him for dinner and she would always come with him.

6 Q. And when did that sort of interaction  
7 start?

8 A. Probably somewhere around maybe 1995. I'm  
9 guessing the date because it's...

10 Q. You have referenced in earlier answers your  
11 SBC presidency. When were you first elected?

12 A. 2008.

13 Q. And that's a lofty role within the  
14 convention?

15 A. Uh-huh.

16 Q. The pinnacle?

17 A. Right.

18 Q. Even though it's unpaid --

19 A. Uh-huh.

20 Q. -- you are the face of the convention  
21 during that time?

22 A. Exactly.

23 Q. And you mentioned being mentored by Adrian  
24 Rogers?

25 A. Uh-huh.

1 Q. I believe he passed away 2005?

2 A. Correct. Yes, ma'am.

3 Q. So before your presidency. But was it him  
4 or someone else who helped teach you how to navigate  
5 SBC politics?

6 A. I'm not sure I ever learned how. That's  
7 where your Barry McCartys come in place to help you.  
8 I had been asked for five terms, so that's a 10-year  
9 period to be the president. And I denied it. Before  
10 Dr. Rogers died, his influence would have said: One  
11 day, God may tap you and it may not be what you want  
12 to do, but you need to lead. And so it was after I  
13 felt it was gone, a large number of pastors. It's  
14 different than today. Today it's people are seeking  
15 the office. Adrian Rogers taught me the office seeks  
16 the man.

17 Q. And who were the people over the course of  
18 that 10 years, the five terms, who encouraged you to  
19 run?

20 A. It would have been practically all of my  
21 peers, large church pastors. Ted Traylor, the Ken  
22 Whittens, the Steve Gaines, that they are all in my  
23 age group, so.

24 Q. And once you agreed to be on the ballot,  
25 what did you do to campaign, if anything?

1 A. Nothing.

2 Q. And what was your platform or your key  
3 issues that you were running --

4 A. Nothing.

5 Q. Were you considered part of the  
6 conservative resurgence or the carryover of that?

7 A. Voted. I was too young.

8 Q. Voted?

9 A. I had no voice.

10 Q. Voted in favor?

11 A. In favor.

12 Q. You also -- you led the pastors conference?

13 A. In '96.

14 Q. Okay. How did that come about?

15 A. Same thing. Basically, you become known as  
16 a leader and people would tap you and lead it. And,  
17 again, you may know, but they honor you by electing  
18 you and you honor them by paying for it.

19 Q. The pastors conference in 1996, do you  
20 remember any themes or topics from that particular  
21 conference?

22 A. Yes, I do. "Love Loud."

23 Q. And did you speak at that conference?

24 A. No.

25 Q. Just to organize it?

1 A. Just to organize it.

2 Q. But you did speak, I assume, at the annual  
3 meeting after elected and ran the meeting while you  
4 were president?

5 A. Exactly.

6 Q. What issues related to sexual abuse came up  
7 during your two terms as SBC president?

8 A. None that I remember, to me personally.

9 Q. So were any sexual abuse topics -- were you  
10 aware of any issues related to sexual abuse within  
11 the convention during your presidency?

12 A. I remember none.

13 Q. There had been discussion of a potential  
14 database --

15 A. Uh-huh.

16 Q. -- of abusers, correct? In 2007, 2008?

17 A. I was not aware of it.

18 Q. So there was no carryover from those  
19 discussions, just in 2008, to your presidency?

20 A. No, ma'am.

21 Q. Do you recall any survivors of sexual abuse  
22 reaching out to you during your presidency?

23 A. I don't.

24 Q. And in those two years, did anyone come to  
25 you in confidence with any concerns about any pastors

1 engaging in sexual misconduct?

2 A. Never.

3 Q. You have talked about sort of the burden of  
4 the role. How would you describe the SBC presidency  
5 if you were telling someone who is not a Southern  
6 Baptist?

7 A. It's a great honor the day you are elected.  
8 And it's a great joy the day you finish.

9 Q. And what do you do?

10 A. What do you do as president?

11 Q. As president?

12 A. Represent entities, you know like, so you  
13 are kind of championing the cause. I led the  
14 convention to give the largest percentage to  
15 international missions in the history of our  
16 denomination. Our agenda was more of a -- we needed  
17 a great commission resurgence. That's what I led.  
18 And it's just we needed to be more faithful at what  
19 we used to do. So that was -- so you just -- you  
20 became the voice, the face, and "bully pulpit," they  
21 call it.

22 Q. And did you tap others to help you with  
23 that great commission resurgence?

24 A. I did.

25 Q. Who were some of those individuals?

1           A.     People like Danny Akin, Al Mohler,  
2     J.D. Greear, Ronnie Floyd.     Those are the major ones  
3     I remember.

4           Q.     So it's fair to say the SBC presidency gave  
5     you more exposure?

6           A.     I'm not sure that would be a true statement  
7     for the simple reason I had such a platform.     I had  
8     been preaching for other denominations.

9           Q.     You didn't need more exposure?

10          A.     I didn't -- no.     Sometimes -- I heard one  
11     preacher that was elected president said:     I'm going  
12     to ride this gravy train.     And his definition was all  
13     these invitations you get.     I already had  
14     invitations.     So I was speaking Sundays in one of the  
15     finest in America.     So why did I want to be gone?     So  
16     I was sending videos everywhere for congratulation  
17     services, but not being there.

18          Q.     Do you think it gave you a larger sphere of  
19     influence within the convention?

20          A.     Not really.     I feel like I may have lost  
21     influence.

22          Q.     How so?

23          A.     When you are leading a charge for  
24     something, you make as many enemies as you do  
25     friends.     And I think I was more popular just as a

1 pastor and one that just cared for pastors.

2 Q. And I want to be clear. Are you talking  
3 about other pastors, other leaders within the  
4 Southern Baptist Convention?

5 A. Uh-huh.

6 Q. What about the average church-going  
7 Southern Baptist in Arkansas? Would they have known  
8 that you were the lead pastor at Woodstock Baptist  
9 Church without you being the SBC president?

10 A. Yes, I --

11 MR. MacGILL: Object to the form of the  
12 question. You may answer.

13 A. I spoke in their state conventions, their  
14 state evangelism conferences, probably 90 percent of  
15 our states, of our 42 state conventions, maybe all of  
16 them prior.

17 Q. (By Ms. Nokes) But, again, it's a subset  
18 right --

19 A. It is.

20 Q. -- of Southern Baptists to go to the  
21 meetings of the local association or the state  
22 conventions. So just your average --

23 A. It would have been --

24 Q. -- white-haired Southern Baptist lady in  
25 the pew, how would she have come to know Johnny Hunt?

1 MR. MacGILL: Object to the form of the  
2 question. You may answer.

3 A. I have no idea. Good question.

4 Q. (By Ms. Nokes) Did you do any media  
5 interviews as SBC president?

6 A. Probably the only media interview I  
7 remember doing is immediately after I was elected. I  
8 stayed out of the paper. I have friends that loved  
9 the press. I just didn't respond to the press.

10 Q. Did you do any non-church-service speaking  
11 engagements, civic clubs or?

12 A. If I did, I can't recall a one.

13 Q. What about political events?

14 A. No.

15 Q. Give the prayer or?

16 A. Oh, yes, I was invited. I pastored the  
17 governor of the state, Sonny Perdue, for eight years.  
18 He was -- taught Sunday school, very good friend. So  
19 when they entertained the Republican governors, I was  
20 asked to do an opening prayer and attend with him.

21 Q. And would you agree that during your term  
22 as SBC president, you were also a trustee or a member  
23 of the Southern Baptist executive committee?

24 A. Ex officio.

25 Q. And what's the difference between a regular



1 member and an ex officio member?

2 A. You have no vote.

3 Q. Are you able to speak in a meeting?

4 A. If they invite you to.

5 Q. And are you expected to attend the  
6 meetings?

7 A. At least one out of your two-year term.  
8 And sometimes someone only has one-year term, but 90  
9 percent of the time, it's you are reelected. I don't  
10 think a -- I don't think anyone has ever been denied  
11 the opportunity that ran for the second term.

12 Q. And do you think your opinions, comments,  
13 positions on issues as an executive committee trustee  
14 carried more or less weight by virtue of you being  
15 the SBC president?

16 A. I would say the same. I think I was  
17 respected by that group. They proved that by  
18 allowing me to speak at about 20 of 25 conventions.

19 Q. Do you recall the executive committee  
20 dealing with any issues of sexual abuse during your  
21 term as an EC trustee?

22 A. I don't recall any.

23 Q. And how would you define in your own words  
24 "sexual abuse"? Back during that time, 2008 to 2010.

25 A. When I think of abuse, I speak -- I think

1 of someone actually being physically hurt or -- so  
2 abusive, which I guess it could have been verbal too.  
3 But that would be all I would have ever probably  
4 considered.

5 Q. And has your own opinion of what sexual  
6 abuse is or is not changed since 2010?

7 A. Yes. It's changed since I now am able to  
8 see the legal definition of it. Absolutely.

9 Q. And what's your understanding of the legal  
10 definition?

11 A. To use sexual abuse would be in the context  
12 of intercourse, at least, and I know in the State of  
13 Florida, and I think in Georgia and Tennessee. So I  
14 see it in that context, but definitely not  
15 consensual.

16 Q. So I want to be clear, you think in order  
17 for there to be sexual abuse, there has to be  
18 intercourse? Under a legal definition?

19 A. That would be part of it.

20 Q. You focused a lot in your ministry on  
21 writing specifically to men and for men. When did  
22 you start your men's conference ministry?

23 A. I finished in 2021. Help me with the math.  
24 I did my last one at Woodstock in 2021, and that was  
25 my 30th year. Thirty years in a row. So I would

1 have started 30 years prior, so.

2 Q. And what prompted you to start those  
3 conferences?

4 A. More of men involvement in church. Women  
5 have taken more of the lead role where men have been  
6 passive. And I felt that if we were going to have a  
7 ministry that would -- my dream was that the sun  
8 would never set on the ministry, men would have to be  
9 involved. So that was -- that was the passion that I  
10 started with.

11 Q. How did you come up with the themes or  
12 topics you covered in those conferences?

13 A. Being a man.

14 Q. And did you deal a lot with topics about  
15 lust?

16 A. Yes.

17 Q. Temptation?

18 A. Yes.

19 Q. Adultery?

20 A. It probably came up. I don't know that I  
21 just wrote a message on adultery, but might have.

22 Q. Did you ever preach at Woodstock on the  
23 topic of adultery?

24 A. I would have to go back and look, 33 years  
25 times 52.

1 Q. And at Woodstock, you helped create a  
2 ministry specifically for wounded and fallen  
3 ministers, correct?

4 A. Uh-huh.

5 Q. Tell us about how that came about, the City  
6 of Refuge?

7 A. City of Refuge. Probably 85 percent of the  
8 men had nothing to do with moral failure, et cetera.  
9 It really started more out of burnout. Pastoring is  
10 a very difficult job, especially when you realize  
11 that 70 percent of Southern Baptist churches run  
12 under 65, that you realize that I've addressed four  
13 nationally, I have been given the assignment to deal  
14 with forced termination and church conflict. It's  
15 massive. And so dealing, helping in that area, so  
16 here would be my premise. We spend our life helping  
17 our people with their issues. Who helps pastors with  
18 theirs?

19 As we see now, if a pastor's issue becomes  
20 public, they are out. But yet we help bring our  
21 people in and offer them hope.

22 Q. And you said 85 percent had nothing to do  
23 with a moral failing. What about the 15 percent that  
24 remain? What were some of their issues?

25 A. Those are numbers I'm speculating. But in

1 that number, it could have just been -- many times  
2 it's the wife that has been abusive in a relationship  
3 and not the husband. But it brings the couple. So I  
4 think it's very clear that the people understand  
5 that.

6 Q. And how might a wife be abusive -- give me  
7 some examples of abusive wives.

8 A. Of a wife that preyed on someone in the  
9 church and that led to an immoral relationship, and  
10 then the pastor has resigned because of the decision  
11 of his wife. And then we brought them in to help  
12 them.

13 Q. And was the reverse also true for some of  
14 the City of Refuge ministers, that it was the  
15 pastor --

16 A. Yes.

17 Q. -- who engaged in sexual misconduct?

18 A. Correct.

19 Q. And the process was the same, regardless of  
20 what the falling --

21 A. Exactly.

22 Q. -- or issue was, correct?

23 A. Correct.

24 Q. And I think this is from some of the  
25 materials. "The City of Refuge is a long-term

1 residential program that attempts to meet the needs  
2 of the minister and his family."

3 A. Uh-huh.

4 Q. Is the end goal restoration?

5 A. Restoration, but in this sense: Number 1,  
6 their relationship with Christ; Number 2, their  
7 relationship with each other; Number 3, their  
8 relationship with the church, being able to hold  
9 their head up again instead of living in shame; and,  
10 Number 4, to service.

11 And when I say "service," they may sing in  
12 our choir. They may work in our parking lot. There  
13 was never: We put you in ministry. That's sacred.  
14 God put them in ministry. Only he can reissue their  
15 ministry. So we never had a way of pipelining people  
16 back into ministry. So a lot of people misunderstood  
17 us. We just wanted to help them be healthy again,  
18 their families be healthy.

19 Q. So there was no letter from City of Refuge  
20 that said, This pastor has successfully --

21 A. Not that I knew of.

22 Q. What about informal phone calls to a church  
23 that might be looking to call the pastor, would City  
24 of Refuge or Woodstock --

25 A. Oh, absolutely not.

1 Q. No vouching?

2 A. They would -- if someone called us and  
3 said -- you know, in other words, we were kind of  
4 like a legitimizer. We were a well-known church with  
5 a great program and great counselors. So they may  
6 would call us to say: This person completed your  
7 program. How do you feel? And we would then turn  
8 them over to those who worked with them.

9 Q. So that would be the process through which  
10 City of Refuge would give a thumbs up or were there  
11 any cases where, for whatever reason, pastors who  
12 came through the program, City of Refuge and  
13 Woodstock just weren't convinced that they got all  
14 the way through the process?

15 A. There were times. And there were also  
16 times that they left the process.

17 Q. And what would be the reasons they didn't  
18 successfully complete the process?

19 A. I couldn't answer that.

20 Q. Could it be lack of transparency?

21 A. Not sure. I never really -- 90 percent of  
22 the time, I was not aware why they were there. I  
23 have never needed to know. If they came in, I put  
24 them with those that could help them.

25 Q. And what was the process for just getting

1 in?

2 A. You -- you made application and then when  
3 you made application, you would meet with James  
4 Eubanks, who was the lead at that time. And then  
5 they would do an assessment and make a decision.  
6 Because they may feel they could get them help in the  
7 city where they lived or --

8 Q. And were any participants in City of Refuge  
9 in pastoral roles while they were going through the  
10 program?

11 A. I'm not aware of any. Could be.

12 (Discussion off the record.)

13 A. We are being too still in here.

14 Q. (By Ms. Nokes) All kinds of --

15 A. Need some movement in here.

16 MR. KLEIN: It's blocked. The motion  
17 sensor is blocked. So that's not helping but  
18 that's okay.

19 Q (By Ms. Nokes) What was your role  
20 specifically with the City of Refuge? What was your  
21 involvement?

22 A. I had no role in the City of Refuge. I --  
23 I introduced it. I just said there needs to be  
24 something like this.

25 Q. So it was your idea?



1           A.     Yes, it was really God's. It's in the  
2 Bible. City of Refuge is referenced twice. And it  
3 really deals with people that have made bad choices  
4 and then how the church comes around to encourage  
5 them.

6           Q.     But was anyone on this side of heaven  
7 involved in the creation of that ministry alongside  
8 you?

9           A.     I just had the dream. Basically I was the  
10 Joseph of the Woodstock church; that is, I dream but  
11 had a great team around me that made the dreams  
12 become a reality.

13          Q.     How long did the City of Refuge program  
14 typically take?

15          A.     Hardly ever did anyone leave in less than a  
16 year. And then many were there for two years.

17          Q.     And were they required to become members of  
18 Woodstock to go through the program?

19          A.     Not required to be members, no, they would  
20 attend Woodstock.

21          Q.     How many people do you think went through  
22 it during its existence?

23          A.     I think I have heard the number of  
24 somewhere between, say, 250 and 300 people that --  
25 over a 28-year period when I left.

1 Q. And when did it end?

2 A. I'm not sure it has. I'm not in touch with  
3 the church, so.

4 Q. Going back to your men's focus ministry  
5 apart from City of Refuge, it was limited to men,  
6 correct? There were no women who -- I know wives  
7 would go through with their husbands.

8 A. Right, uh-huh.

9 Q. But it was focused more on the men?

10 A. Well, and in -- they would come in, but  
11 then there were women counselors and men counselors.  
12 So they had group therapy equally for the women and  
13 the men.

14 Q. Do you recall a conference or a series of  
15 sermons you gave on Temptation Island?

16 A. I do.

17 Q. Tell me about those messages. What  
18 prompted them and what the heart of the message was?

19 A. Well, picked up on the theme from  
20 television. And it was really we live on an island  
21 of temptation. Now, whether -- and it's not just in  
22 that area. I mean, whether it's temptation of pride,  
23 which is the most insidious sin, in God's word.  
24 Power. There was money. Sex. So -- so I dealt with  
25 different themes.

1 Q. And what about the distraction of  
2 attraction, do you remember messages on that topic?

3 A. Title, and that's probably 15 or 20 years  
4 old. So I would have to go back and read it.

5 Q. We have talked about adultery. You don't  
6 recall specifically any sermons or talks at  
7 conferences on that topic?

8 A. I have preached some 51. So I'm sure I  
9 referenced adultery with David.

10 Q. And what about the conscience, things  
11 waking on your conscience?

12 A. I have dealt with the conscience.

13 Q. And what are your teachings on that topic?

14 A. I have no idea.

15 Q. What are your thoughts on that topic?

16 A. I hardly remember what I preached last  
17 Sunday, much less 16, 20 years ago. On the  
18 conscience, well, I would say my own conscience. I  
19 have to deal with bad choice for the last 14 years.  
20 So it bears on my conscience. Kind of my inner  
21 clock, my inner alarm. And so...

22 Q. What do you mean by that; can you  
23 elaborate?

24 A. Yes. I wish I had never crossed to another  
25 balcony. So that bears on my conscious because I

1 have deep conviction against that. So I went against  
2 a core belief of my own heart.

3 Q. Do you wish you would have handled the  
4 aftermath differently?

5 A. No, I think I handled it perfectly.

6 Q. And I have your book "Unspoken."

7 A. Okay.

8 Q. And I think it was written in 2018.

9 A. Uh-huh.

10 Q. I'm going to just read you a quote from  
11 it --

12 A. Okay.

13 Q. -- and see if it's something you still  
14 agree with. This is on Page 33.

15 MR. MacGILL: Do you have extra copies of  
16 that?

17 MS. NOKES: No. I will hand this one after  
18 I read from it.

19 MR. MacGILL: Okay. That's fine.

20 MS. NOKES: "God gives us chance after  
21 chance to come clean, to admit the truth, to  
22 speak up and remain silent no longer. If we  
23 refuse, we allow our fears to keep our mouth  
24 shut. Eventually the time will come when our  
25 sin does find us out. Sometimes even in this

1 world, that sin goes proclaimed from the roofs."

2 A. I believe it with all my heart.

3 MR. MacGILL: All right. And this is what  
4 you circled?

5 MS. NOKES: It's the underlined part.

6 A. And, yes, I still believe that.

7 MR. MacGILL: Hold on one moment, please.  
8 And, Counsel, you were reading from the book  
9 "Unspoken" by Pastor Johnny Hunt?

10 MS. NOKES: Yes, published in 2018.

11 MR. MacGILL: And Page 33?

12 MS. NOKES: Correct.

13 MR. MacGILL: Thank you.

14 Q. (By Ms. Nokes) Mr. Hunt, do you know  
15 personally any Southern Baptist preachers who have  
16 committed adultery and continued to be pastors?

17 MR. MacGILL: Counsel, could you define  
18 "adultery" for us?

19 MS. NOKES: Being unfaithful to one's  
20 spouse.

21 A. That is adultery?

22 MR. MacGILL: We are going to object to --  
23 just so you defined it.

24 Q. (By Ms. Nokes) Well, let me ask Mr. Hunt.

25 MR. MacGILL: She has defined it that way.

1 THE WITNESS: Okay.

2 MR. MacGILL: So use her definition or if  
3 you want to ask your questions. But we are  
4 going to need to have this defined.

5 Q. (By Ms. Nokes) How do you define  
6 "adultery"?

7 A. Adultery is a man that is married and he  
8 has sexual intercourse with someone other than his  
9 wife.

10 Q. So Bill Clinton did not commit adultery?

11 A. I don't know his story.

12 Q. If it did not result in sexual intercourse,  
13 which we will define as a man's penis being inserted  
14 into a women's vagina --

15 A. Uh-huh, right.

16 Q. -- to be clear about that definition --  
17 anything short of that is not adultery?

18 MR. MacGILL: Well, Counsel, he's answered  
19 your question. So you're following up here?

20 MS. NOKES: I'm clarifying. I want to make  
21 sure we are working off the same definitions.

22 MR. MacGILL: All right. May I hear his  
23 prior answer back and your question, please.

24 THE COURT REPORTER: Which question?

25 MR. MacGILL: Where Pastor Hunt described

1 adultery and then Scarlett had a follow-up  
2 question.

3 (WHEREUPON, the record was read back by the  
4 reporter as follows:)

5 You said, "Mr. Hunt, do you know personally  
6 any Southern Baptist preachers who have  
7 committed adultery and continued to be pastors?"

8 And you asked her to define adultery for  
9 us.

10 And she said, "Being unfaithful to one's  
11 spouse."

12 And he said, "That is adultery?" And then  
13 you asked for --

14 MR. MacGILL: Well, then the next -- then  
15 his answer, where he --

16 THE COURT REPORTER: "Adultery is a man who  
17 is married and who has sexual intercourse with  
18 someone other than his wife."

19 And she said: "So Bill Clinton did not  
20 commit adultery?"

21 And answer: "I don't know his history."

22 And question: "If it did not result in  
23 sexual intercourse, which we will define as a  
24 man's penis being inserted into a women's  
25 vagina -- to be clear about the definition --

1 anything short of that is not adultery."

2 MR. MacGILL: Now, you want him to use your  
3 definition now. That's why I was wanting to  
4 hear this. You want him to use your definition?

5 MS. NOKES: I want to continue asking  
6 questions, and we will get to a working  
7 definition.

8 MR. MacGILL: Well, he did. He gave a  
9 definition. Now, I just want to make clear, you  
10 have made a definition and are you asking him to  
11 affirm or not your definition?

12 MR. BESEN: I think this will all be clear  
13 if you just let her ask questions.

14 MR. MacGILL: All right. Well, why don't  
15 we start with a new question because I couldn't  
16 follow what you were doing. But if you want to  
17 ask a new question, maybe that's the most  
18 efficient way to do it.

19 Q. (By Ms. Nokes) What do you consider being  
20 unfaithful to one's spouse?

21 A. To be unfaithful, to me, in my heart, would  
22 have been to have gone to another lady's room. But  
23 that is not adultery.

24 Q. Okay. When do you cross the line from  
25 being unfaithful to committing adultery?



1 A. When you have sex with her.

2 Q. And by "sex," you mean intercourse?

3 A. Intercourse. Exactly.

4 Q. So you could be unfaithful by going to a  
5 woman -- not your wife's -- room and kiss her and  
6 that is not adultery?

7 A. That's not adultery.

8 Q. Is that what you have counseled people over  
9 the years who've come to you seeking marital help?

10 A. The Bible would counsel that. And  
11 absolutely.

12 Q. What does the Bible say about adultery?

13 A. That would -- the Bible speaks of adultery  
14 in the sense of David. And David had a relationship  
15 with Bathsheba and she bore a son. But if she hadn't  
16 borne a son, she still had had sex and he had  
17 committed adultery.

18 Q. What's your view on emotional affairs?

19 A. It would just be that a person had deep  
20 feelings for someone other than their spouse.

21 Q. Is that being unfaithful?

22 A. It would be unfaithful but not adultery.

23 Q. So your definition of adultery is limited  
24 to sexual intercourse with someone not your spouse?

25 A. Yes. Other than that, the Bible used the

1 word and history will use the word, "fornication."

2 Q. Let me go back to an earlier question. Do  
3 you know any Southern Baptist pastors that have been  
4 unfaithful to their spouse who have continued on as  
5 pastors?

6 A. Yes.

7 Q. Who are they? Well, let me ask this. How  
8 many do you personally know?

9 A. I have no idea.

10 Q. More than three?

11 MR. MacGILL: And when -- I would give you  
12 a caution here. There is a priest penitent  
13 privilege, all right? And she's not asking you  
14 to violate -- and I'm sure this is correct, and  
15 correct me if I'm wrong -- any priest penitent  
16 privilege. But if you have any knowledge  
17 outside of that privilege, you should answer her  
18 question. Do you know what I'm saying?

19 THE WITNESS: Correct.

20 MR. MacGILL: Could you --

21 Q. (By Ms. Nokes) And to be clear, I'm asking  
22 about other pastors that you are just aware of -- and  
23 I'm limiting it to Southern Baptists, who have been  
24 unfaithful to their wife -- because all Southern  
25 Baptist pastors are men -- but continue to be

1 Southern Baptist pastors after being unfaithful.

2 A. All Southern Baptist pastors are not men.

3 Q. Okay.

4 A. Just for the record. That's another issue.

5 Q. Yes, we won't get into that today.

6 A. So I understand. But I would not feel at  
7 liberty to give names --

8 Q. I'm not going to ask you for names. I  
9 asked that question, but I withdraw it. I just want  
10 to know a number.

11 A. I would be guessing.

12 MR. MacGILL: Again, I'm going to give you  
13 the same counsel. I think you have an  
14 obligation, as a priest, not to give penitent  
15 information in any way, shape or form. And I  
16 can be corrected, Scarlett, if you have  
17 authority to the contrary. But I'm just going  
18 to caution you that -- that that privilege  
19 exists, and you should answer her questions to  
20 the extent you can, completely and fully. But  
21 I'm just asking you to be cognizant of any  
22 priest penitent privilege. But please answer  
23 all questions that she's putting to you on the  
24 topics.

25 A. I would be guessing. I have been a pastor

1 for 46 years. I would have to go back and think. I  
2 know some that committed adultery or it could be,  
3 just like with my case, false allegations. So I  
4 would be using false allegations.

5 Q. (By Ms. Nokes) Well, you keep saying "false  
6 allegations," but you did, in fact, kiss another  
7 man's wife, correct?

8 A. I have never kissed her lips in my life.  
9 My lips have never touched her lips, so help me God.

10 Q. Now I'm confused.

11 A. Okay, good.

12 Q. Because your complaint very clearly says  
13 that the encounter with Jane Doe involved kissing and  
14 awkwardly foundling.

15 A. Because she said I kissed her forehead at a  
16 time earlier. She just didn't get the context, with  
17 her husband there, when they were both crying as I  
18 was offering counsel because things had fallen apart  
19 at their church. She also said on one occasion,  
20 which I do not remember, that I kissed her hand. And  
21 that was a real grooming moment, according to her  
22 testimony. But, no, my lips have never touched her  
23 lips.

24 Q. I want to be crystal clear that in her  
25 condo on July 10th, 2010, you did not kiss Jane Doe?

1           A.     My hand raised to God, my lips have never  
2 touched █████ █████ lips, ever.

3           Q.     And you did not awkwardly fondle her?

4           A.     I did awkwardly fondle her because she was  
5 coming on to me. I have never been questioned before  
6 is the reason I'm so excited about being here today.  
7 I have never been -- had an opportunity. And I will  
8 speak to all of the Guidepost report and how that  
9 came about. I have never been questioned.

10          Q.     Let's go ahead and just hear from start to  
11 finish your take on your interaction with Jane Doe on  
12 July 10th, 2010.

13          A.     I had spoke that morning, preached that  
14 morning and was resting in my condo. I had no idea  
15 she was coming to my condo. No idea. I had received  
16 a text from █████ saying that he was going to  
17 probably send her down there, and if I saw her, look  
18 out for her. I guess what that meant to me, the only  
19 place I had ever seen her in my life was walking by  
20 the beach when my wife and I were there and them  
21 being together and speaking. So I thought that's  
22 what he meant until I received a text from her. And  
23 it was the pier out from my place. And my response  
24 was simple: Where are you?

25                   She said: Come to the balcony. She had

1 rented a room next to me, unknowing to me. She had  
2 just been there two weeks prior without her children  
3 and with her husband. Now she's without her husband  
4 or her children. She encourages me to come to her  
5 side of the balcony. She says she wants me to come  
6 there so I won't be in the sun. She's exposed to the  
7 exact same sun mine is. Mine's beside them. There's  
8 no trees. The sun is there. It would be the same  
9 temperature on her side as mine. And I continued to  
10 refuse. She continued to seduce. And so with what I  
11 would call temporary forgetfulness of God on my  
12 behalf -- I take full responsibility -- I went over  
13 and went to her balcony. She said she wanted to talk  
14 to me. She places her feet up on my knees. I said:  
15 What do you want? Me to rub your legs? She said:  
16 It would be nice. And then she said: I knew if I  
17 could get you to come over here, hopefully, you would  
18 ask to touch me because you are a perfect gentleman.  
19 And that is fine.

20           And then I said, I don't feel comfortable  
21 on the porch. So we went inside. But as we went  
22 inside, I said, I really should leave. She said,  
23 Please don't. Just be seated on the couch. Just sit  
24 here on the end of the couch. And so she talked me  
25 into sitting on the end of the couch. She was

1 sitting on the opposite end.

2 But then she turned around and spread her  
3 legs toward me. And then said, Please come closer.  
4 That's where she would say I pinned her in. At her  
5 request, I came and sat besides her. And then she  
6 lowered her top. She made herself available, to let  
7 me know the reason she could not go jogging with me,  
8 which I never invited her to run with me, and when  
9 she requested the next day, I denied her. She said,  
10 I can't go running because I don't have a sports bra.  
11 And I have to have a sports bra to run. And so when  
12 she did that is when I fondled her. And then I  
13 pulled her pants down with her help.

14 But as I did, I came under deep conviction,  
15 stood up and said, I love my wife, and I love your  
16 family. And I shouldn't be here. And I'm sorry.  
17 And I left. As I was leaving, she said, Please don't  
18 be this way. It's only the first day.

19 I was never given the privilege to tell  
20 that story to Guidepost. And I'd never been alone  
21 with her before -- it was not an affair; it was an  
22 encounter -- and never after. And she continued to  
23 reach out through her husband over the years.

24 Q. It was being unfaithful to your wife?

25 A. Yes, ma'am. But not adultery. I thank God

1 I stopped when I did and left. And you can deem that  
2 fornication. You are severely wrong to call it  
3 adultery.

4 Q. Do you know any Southern Baptist pastors  
5 that have admitted to being unfaithful to their  
6 spouses and stepped away from their pastoral role  
7 because of that sin?

8 A. No one comes to mind.

9 Q. Not a single one?

10 A. No.

11 Q. Did Woodstock --

12 MR. MacGILL: And, again, you are answering  
13 on the same basis as before, not disclosing any  
14 priest penitent communications, right?

15 THE WITNESS: Uh-huh.

16 MR. MacGILL: You understand?

17 THE WITNESS: Right.

18 MR. MacGILL: And that remains your  
19 obligation from the beginning of this deposition  
20 to the end. You understand?

21 THE WITNESS: Yes.

22 MR. MacGILL: Okay.

23 Q. (By Ms. Nokes) During your tenure at  
24 Woodstock, did the church deal with any ministers,  
25 pastors or employees who engaged in sexual



1 misconduct?

2 A. In my 33 years, one.

3 Q. And was that person allowed to continue  
4 working for the church?

5 A. They stepped away and received counsel and  
6 healing. And then after a long period of time, we  
7 invited them back.

8 Q. And would you be surprised if current  
9 Woodstock leadership tells us there are at least four  
10 former employees that fall under that category?

11 MR. MacGILL: Object to the form of the  
12 question. Lack of foundation.

13 A. I don't -- I mean, I wouldn't be surprised,  
14 but then in a church that large, oftentimes they  
15 dealt with issues. I would think they would bring it  
16 to me, but I'm -- my mind right now, I'm thinking,  
17 Who? So.

18 Q. (By Ms. Nokes) How would you describe your  
19 ministry from 2011 to 2022, say, April of 2022?

20 A. Greatly blessed.

21 Q. And you took your extended sabbatical in  
22 the summer of 2010, correct?

23 A. Uh-huh, correct.

24 Q. When you went back to the church that  
25 August, September?

1 A. I think somewhere in there.

2 Q. Any change in your role at that point in  
3 time?

4 A. None.

5 Q. Just back to business as usual?

6 A. Correct.

7 Q. And that included drawing your salary from  
8 the church?

9 A. Correct.

[REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

8 Q. Why don't we do this, we have been going  
9 about an hour. Let's take a break and I will get the  
10 documents out --

11 A. That would be fine.

12 Q. -- before we go back on the record. It  
13 will streamline things a little bit.

14 MR. MacGILL: That's fine. About 10  
15 minutes?

16 THE VIDEOGRAPHER: The time is 10:14 a.m.  
17 Going off the video record.

18 (WHEREUPON, a recess was taken.)

19 THE VIDEOGRAPHER: We are back on the  
20 record. The time is 10:30 a.m.

21 Q. (By Ms. Nokes) Mr. Hunt, it's been noted  
22 that you and I are sometimes talking over each other.  
23 So I just request that you try to wait until I finish  
24 my question to answer.

25 A. Okay.









1 A. I did.

2 Q. -- in 2019 and were also working for the  
3 North American Mission Board that year?

4 A. Correct. Uh-huh.

5 Q. Was that the only year that you actually  
6 worked for both?

7 A. Yes. I was transitioning out with a new  
8 pastor coming in. So he was -- he was doing most of  
9 the leadership at the church, but nonetheless.

10 (Defendants' Exhibit 7, 2020 Tax Returns,  
11 marked for identification.)

[REDACTED]











1           A.     With my wife, with my counselor and with  
2     the ██████████

3           Q.     Did you ever have an accountability partner  
4     or accountability team beyond those individuals you  
5     listed?

6           A.     Not during those days, no.

7           Q.     And did you ever require counseling, not to  
8     get into the substance of the counseling, but did you  
9     ever get counseling services after 2010?

10          A.     Not until the false allegations came out.

11          Q.     Okay. Mr. Hunt, do you believe that women  
12     and Southern Baptist women in particular seek out  
13     powerful men and pursue them?

14                   MR. MacGILL: Object to the form of the  
15     question.

16          A.     I would be guessing.

17          Q.     (By Ms. Nokes) You have never said that to  
18     other people before, something along those lines?

19          A.     I would say that anyone that is greatly  
20     used in life, it seems like there's a target on them.  
21     I think some people would be drawn to a person of  
22     influence or feel like they have got their act  
23     together. I have often wondered if that's what --  
24     why Lisa stalked me.

25          Q.     You said stalked you?

1 A. Yes, ma'am.

2 Q. How do you define "stalk"?

3 A. Moving into a condo next door to me seven  
4 hours from her house.

5 Q. Moving in?

6 A. And then pursuing -- renting that place  
7 next to me and then pursuing me.

8 Q. And did that happen on any occasion other  
9 than the one we have talked about?

10 A. Never.

11 Q. Did you get that feeling from her before  
12 that date?

13 A. Never.

14 Q. That she was attracted to you?

15 A. No, I was never in her presence other than  
16 with her husband, never felt that way.

17 Q. Have you made comments along the lines of  
18 what I mentioned, that women seek out powerful men,  
19 have you referenced that in discussing the misconduct  
20 of other pastors with women who are in their  
21 congregation and under their pastoral authority?

22 A. I would be speculating to say that because  
23 I can't come to mind to say 13 years ago in one of my  
24 sermons, so I -- I couldn't.

25 Q. It's possible?

1 A. Exactly. It is possible.

2 Q. Have you expressed to others a concern that  
3 that kind of seeking out a powerful man could take  
4 his ministry down?

5 A. Absolutely.

6 Q. And have you said that you feel like  
7 women -- and I'm not necessarily talking about Jane  
8 Doe, but could be any woman -- have come on to you  
9 because of your status as a powerful man within the  
10 Southern Baptist Convention?

11 A. I don't know that I have ever referred to  
12 myself as a powerful man.

13 Q. Have you referred to other women coming on  
14 to you for whatever reason?

15 A. Yes.

16 Q. Has that happened a lot over the course of  
17 your ministry?

18 A. No, not at all. No.

19 Q. How many times, do you think?

20 A. If I were guessing, I would say maybe  
21 three.

22 Q. And do you hold the belief today that women  
23 are attracted to and come on to powerful men?

24 A. That would be too broad a statement for me  
25 to say yes to.

1 Q. How would you --

2 A. I would say that's possible that could  
3 happen, but I would never say a lot of women or -- I  
4 don't know.

5 Q. Okay. And if we have other witnesses that  
6 say you have minimized sexual misconduct by pastors  
7 where there's a clear power differential based on the  
8 women's propensity to be attracted to and come on to  
9 a powerful man, would you dispute that you have made  
10 comments along those lines?

11 MR. MacGILL: Object to the form of the  
12 question. Lack of foundation.

13 A. I'm not sure I understand your question.

14 Q. (By Ms. Nokes) If other people have said in  
15 your conversations with you that you have excused the  
16 misconduct of other pastors, unfaithful sexual  
17 misconduct of other pastors by saying that's just a  
18 woman coming on to a powerful man trying to trap him  
19 and take down his ministry?

20 A. Yes. I don't recall ever saying something  
21 like that.

22 Q. But that's also possible?

23 A. It's possible, yes, ma'am.

24 Q. We talked in a roundabout way about Johnny  
25 Hunt Ministries, but tell in your own words, what is



1 Johnny Hunt Ministries?

2 A. Johnny Hunt Ministries is coming to a place  
3 in my life that I felt I made enough income pastoring  
4 my church, and I felt that anything beyond that, we  
5 would place in an account and we'd give to missions  
6 and to poverty and other areas where we felt we could  
7 be of help. And so we have done that for years.

8 Q. Do you remember when it was formed?

9 A. I don't.

10 Q. And do you know if it's a for profit or a  
11 not for profit?

12 A. It's a not for profit.

13 Q. And is it incorporated here in Georgia?

14 A. It is.

15 Q. Does it have any employees?

16 A. No, ma'am.

17 Q. Any contractors that get 1099s that are  
18 paid through Johnny Hunt Ministries?

19 A. No, ma'am.

20 Q. Has it ever?

21 A. I don't -- I can't recall. My wife does  
22 the book counting. So maybe she will remember. I  
23 don't remember ever giving anyone a 1099 from Johnny  
24 Hunt Ministries.

25 Q. As a nonprofit, does it have a board?

1 A. It does.

2 Q. Who is on that board currently?

3 A. Let's see, Ginger Anspaugh.

4 Q. Who is she?

5 A. She was a business lady in our church. And  
6 so she's in another church now. She serves on the  
7 board. And John Kisse, and he would be a  
8 businessman and has served. And then I think my wife  
9 is the secretary. And I can't remember if there's  
10 one more. Janet would know that.

11 Q. And the two individuals who are in the  
12 business world that you mentioned, how long have they  
13 been on the board?

14 A. Maybe two years.

15 Q. And have family members traditionally  
16 served on the board?

17 A. I don't believe any family has been -- I  
18 don't remember. If they did, one of my son-in-laws,  
19 but I'm not sure. Again, Janet keeps that. And I  
20 think we are dealing with that tomorrow, so.

21 Q. What are the sources of revenue to Johnny  
22 Hunt Ministries?

23 A. The majority has been when I sell books, I  
24 place the money in there. All of the speaking that I  
25 do and even now, I have been placing it. However, my

1 wife said: You don't have an income. So I just  
2 started telling people to pay me.

3 Q. When did you do that?

4 A. Probably in the last five weeks, maybe not  
5 even five weeks. But now I'm taking the income from  
6 where I'm speaking. But it was just I didn't think  
7 about it. You know, just always have been made to  
8 assume- -- all of my outside speaking has been money  
9 that we received that we underwrote our mission.  
10 I'll be in four different countries in May. And so  
11 we pay all of our own expense. And you even have to  
12 compensate, in especially third-world country  
13 conferences. And that money allows us to do that.

14 Q. Does Johnny Hunt Ministries have any  
15 expenditures?

16 A. Maybe a copy machine every now and then or  
17 something like that, but.

18 Q. So the money flows in from your writings  
19 and speaking?

20 A. Speaking. That's the majority.

21 Q. And then flows out to mission work?

22 A. Missions and different missionaries and  
23 people in ministries.

24 Q. What's your connection to or involvement  
25 with It's a New Day, Inc.?

1 A. Today, nothing.

2 Q. And historically, what has your involvement  
3 been?

4 A. It was mine. I owned it.

5 Q. And what is It's a New Day?

6 A. It's the tape ministry.

7 Q. Tape ministry?

8 A. That's the tape ministry.

9 Q. Do you know the years it was operational?

10 A. It still is. So it was probably -- it's  
11 probably 25 years old.

12 Q. And you gifted it to your daughter, I think  
13 you said earlier?

14 A. Daughter, uh-huh.

15 Q. When was that?

16 A. Close to 25 years ago.

17 Q. And was it set up as a for profit or a not  
18 for profit?

19 A. Not for profit.

20 Q. And does it have any employees currently,  
21 if you know?

22 A. I think it has one.

23 Q. Do you know who that is?

24 A. Carrie Day works part-time -- I mean, not  
25 Carrie Day, I'm sorry. Carrie Gwen works part-time

1 there.

2 Q. And, historically, how many employees has  
3 it had?

4 A. I don't think it's ever had more than two.

5 Q. Is there a board for It's a New Day?

6 A. I'm sure they have one, but I'm not  
7 affiliated with it at all.

8 Q. When you were affiliated, was there a  
9 board?

10 A. A board, yes.

11 Q. Do you recall who was on it?

12 A. Too -- too far.

13 Q. Did you derive any income from It's a New  
14 Day?

15 A. No.

16 Q. Where did the money flow out to from it?

17 A. Probably employees. Just a bit of  
18 information: Any pastor in the world could request a  
19 tape and we gave it to them, and missionaries. So it  
20 was really a giving ministry to people. So there's  
21 pastors in our convention that would say their  
22 closets are full of free tapes that they received.

23 Q. What's your current connection to or  
24 involvement with New Song Ministries, Inc. and  
25 Extreme Conferences?

1           A.     Extreme Conferences, I have spoke until the  
2 false allegation removed me. The New Song, I have  
3 served as one of their board members for probably 20  
4 years.

5           Q.     Are those two separate entities or is that  
6 the same thing?

7           A.     Well, New Song is, first of all, a singing  
8 group. But they have ministries like Winter Jam.  
9 That's theirs. Winter Extreme is two conferences  
10 that take place the week after Christmas. That's all  
11 that is. And so I used to speak on those until the  
12 false allegations removed me.

13          Q.     So you have not gone back to those speaking  
14 engagements like you have Jubilee?

15          A.     No. Senior adults are more forgiving.

16          Q.     Is New Song or the Extreme Conferences, is  
17 it set up as a for profit or not for profit?

18          A.     They are not for profit, but I have, you  
19 know, nothing to do with it other than I just go to a  
20 board meeting a couple of times a year.

21          Q.     Who else serves on that board with you?

22          A.     It would be Eddie Carswell, which owns that  
23 ministry, and Billy Goodwin, which is the only other  
24 owner. There's just two owners in New Song. And I'm  
25 not sure because -- I'm not even sure I'm still on

1 the board. I may have lost that also because of the  
2 false allegation. Because I haven't been informed of  
3 any meetings.

4 Q. When was the last time you recall going to  
5 a meeting?

6 A. Two years ago.

7 Q. Do you recall the month?

8 A. It would have been probably June. Normally  
9 they would do it in the summer. Summer meeting.

10 Q. So June of 2022?

11 A. Twenty-two.

12 Q. After the report came out?

13 A. Right, uh-huh.

14 Q. Do you derive any income or financial  
15 benefit from Extreme Conferences?

16 A. Only if I speak and I get an honorary.

17 Q. Do you have any current connection to or  
18 involvement with Jubilee conferences?

19 A. Yes, I speak only. So I only get an  
20 honorary for speaking.

21 Q. Who owns it?

22 A. My son-in-law, Jay Carswell.

23 Q. And you were just there speaking before  
24 coming here today, right?

25 A. Correct. And that's where I was the first

1 time I was interviewed by Guidepost two years ago  
2 this week.

3 Q. And you said in your interrogatory  
4 responses that you said you believed you had lost out  
5 on Jubilee engagements, but that's no longer true?

6 A. No, no, I didn't say that in  
7 interrogatories. I said that I lost out on Favored  
8 Women and Extreme Conferences, that I'm still doing  
9 Jubilee. I didn't do them -- I didn't do anything  
10 the year after the report came out until the end of  
11 the year.

12 Q. And did they -- were you scheduled to do  
13 Jubilee and they cancelled?

14 A. I was, yes, ma'am.

15 Q. Who works at Jubilee now?

16 A. Works?

17 Q. Are there other employees?

18 A. It would be my son-in-law runs it, and my  
19 grandson-in-law works in it and his wife, my  
20 granddaughter and my daughter, and then they have  
21 some employees.

22 Q. Is there a board?

23 A. I don't know. I have nothing to do with  
24 that ministry.

25 Q. So your role is simply to show up and





1 American Mission Board when I went there in 2020 for  
2 perseverance and there would be something to continue  
3 after I'm gone.

4 Q. Is it still operational now?

5 A. No. Everyone cancelled me, in the sense of  
6 that. So they don't want a name affiliated with me.  
7 It's a cancel culture, because of what Guidepost did.

8 Q. And have you started a similar ministry  
9 called Advanced?

10 A. No. I did Advanced for the last 15 years.

11 Q. Okay. So it's totally different --

12 A. Totally different.

13 Q. -- than Timothy Barnabus?

14 A. That's -- Timothy Barnabus was a lot of  
15 pastors from all over the country coming. This is  
16 invitation only. More of large church pastors  
17 that -- large churches only make up about 2 percent  
18 of the nation's population. So they have different  
19 issues than you would have just in a room with mostly  
20 pastors that have a hundred on Sunday.

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]



1 A. I don't know. I really don't.

2 Q. Do you know why the payments stopped after  
3 2018?

4 A. I don't know why it started. So, no,  
5 ma'am, I don't.

6 Q. And then we talked about Advanced. Is it  
7 incorporated or is it under Johnny Hunt Ministries?

8 A. It's just an event I do. Just -- so, no, I  
9 don't know that it's incorporated, no.

10 Q. And you don't derive any income from it?

11 A. Income from it, no, ma'am.

12 Q. Do pastors ever pay -- do they collect a  
13 love offering?

14 A. Not -- no. It's basically they just pay  
15 their own way and they are there. And there's enough  
16 coverage that it would pay my way. I don't have to  
17 pay to be there to host them. But it's like a  
18 four-day event.

19 Q. And you said it's invitation only.

20 A. Yes, ma'am.

21 Q. Do you have any trouble getting people,  
22 pastors to accept those invitations?

23 A. No. It's basically, if anything, they are  
24 saying I hope we keep it at 30, so.

25 Q. Do you have any connection to 3H Travel,

1 LLC?

2 A. Nothing. It's my daughter's business.

3 Q. What kind of business is it?

4 A. Travel.

5 Q. Is there a board?

6 A. I don't know anything about her business.

7 Q. Does she handle all of your travel?

8 A. Most. Not all.

9 Q. And what about 3H Publishers, Inc.?

10 A. That's mine.

11 Q. And what is it?

12 A. But it's not -- I don't have it any longer.

13 That -- at one time, I not only wrote books for  
14 publishers, but I put books together for pastors of,  
15 like, the whole book of Acts, like a commentary. So  
16 I did that. So I just did self-publish because I  
17 already had all the work myself. So I did that for  
18 years. But I no longer have that company.  
19 Everything is Johnny Hunt Ministries now.

20 Q. Do you know when 3H Publishers stopped  
21 operating?

22 A. Ms. Hunt could tell you.

23 Q. Do you have any connection to Carswell  
24 Motorsports, LLC?

25 A. No, but they really did a good job running

1 that false narrative on the fact that I owned  
2 everything. So I see the line of reason that we are  
3 taking here, that Baptist news ran, that I -- the  
4 Hunt Empire. Have absolutely nothing to do with  
5 them. I have children, family that's been greatly  
6 blessed and are hard workers. And I'm so grateful  
7 God has been good to us, and we can be good. We have  
8 been blessed to be a blessing. So I see the line of  
9 reasoning of -- that we have just really been heavily  
10 involved in helping people, and you can't help people  
11 without it normally helping you.

12 Q. We talked quite a bit about NAMB and remind  
13 me, did you go to work there in 2019 or 2020?

14 A. 2019. And I will just be real clear. They  
15 wanted my name. They wanted Johnny Hunt there  
16 because they were struggling a lot. They needed a  
17 name of integrity and a name of leadership to help  
18 them. And so because I couldn't go full time until  
19 2020, but they just said if we could just have your  
20 name and you just do a number of conferences, we want  
21 you now. And that was our understanding.

22 Q. And so to help them, was that in terms of  
23 leadership?

24 A. Leadership.

25 Q. And was it to enhance their finances and

1 encourage giving?

2 A. No, it wasn't about giving. It was  
3 leadership.

4 Q. And was the role created just for you?

5 A. They have had people in the past to do a  
6 number of things. But I don't think they had ever  
7 had a person to do leadership and evangelism.

8 Q. And that was your title, right, senior vice  
9 president?

10 A. Senior vice president. So I answered only  
11 to the CEO.

12 Q. Okay. And you were working there prior to  
13 the release of the Guidepost report, correct?

14 A. Correct.

15 Q. Did your role ever change during the  
16 three-plus years you were at NAMB?

17 A. No.

18 Q. What were your duties and responsibilities  
19 in your role?

20 A. They wanted me to help pastors. So I did.  
21 In 2021, I think I did 13 Timothy Barnabus  
22 conferences, and they last like three to four days.  
23 So 13 of those. And then I would teach one day  
24 evangelism conferences somewhere around our 42 state  
25 conventions. So very little time in the office. I

1 was out constantly with pastors.

2 Q. Did you have to fill out paperwork to get  
3 employed or was this more you said they sought you  
4 out?

5 A. Uh-huh.

6 Q. Did you do the regular employee onboarding?

7 A. I did.

8 Q. Did you fill out a paper application?

9 A. I did.

10 Q. Did it ask about any past failings?

11 A. I don't remember.

12 Q. Did it ask if you'd ever been unfaithful to  
13 your spouse?

14 A. I don't remember that being on there.

15 Q. Does NAMB have policies in place about  
16 interactions with the opposite sex?

17 A. I bet they do now.

18 Q. And do you recall anything Dr. Ezell said  
19 during your onboarding process about interactions  
20 with the opposite sex?

21 A. I don't remember him saying anything.

22 Q. Did you receive any training before you  
23 started working at NAMB?

24 A. I don't remember anything formal. It could  
25 have been. And I just -- I was multitasking so many



1 things. And maybe Mr. Ezell told you that the reason  
2 he's there is because I turned down his job with a  
3 unanimous vote. And I think he was excited about  
4 having me since they wanted me to lead the  
5 organization.

6 Q. And you were friends, correct?

7 A. We have been friends a long time.

8 Q. And would you say he was your direct  
9 supervisor at NAMB?

10 A. Yes, ma'am.

11 Q. I know you said you reported to him?

12 A. He would be.

13 Q. Did anyone report to you? Did you have a  
14 staff?

15 A. I did.

16 Q. Who was on your staff?

17 A. I had a ministry assistant that I brought  
18 from Woodstock, Donna. I had a young man named Shane  
19 that helped in student evangelism. I had a couple of  
20 associates that helped me because if I decided I was  
21 going to do a Timothy Barnabus in Lake Tahoe, I  
22 didn't do anything. They lined everything up. I  
23 just showed up to speak. So they were constantly  
24 busy traveling, scheduling our meetings. I had a  
25 young lady named Catherine that worked especially

1 with women, part of our ministry.

2 I think that's -- that's it.

3 Q. And when did your NAMB employment end?

4 A. When I got back from being ambushed by  
5 Guidepost, I called Kevin and told him I wanted to  
6 meet the next day. And I said, I don't know what  
7 they are going to say, but I want you to hear from me  
8 what I did twelve years ago. And they are going to  
9 put it in a report of some form, and I'd rather step  
10 away instead of causing you grief. And I offered my  
11 resignation that day.

12 Q. So that was May 13th?

13 A. Correct.

14 Q. And the second interview you did with  
15 Guidepost was on May 12th?

16 A. It wasn't an interview.

17 Q. You talked to Guidepost --

18 A. It was not an interview.

19 Q. -- on May 12th?

20 A. Very little. They talked over each other  
21 to me. They were very determined. They had already  
22 made their case, and now through the depositions that  
23 I have been able to view, the report was written two  
24 days before they talked to me.

25 Q. And so --

1 A. Their minds were made up.

2 Q. You have written a lot on leadership?

3 A. Uh-huh.

4 Q. You are a confident man and leader. Are  
5 you saying they wouldn't let you speak in the meeting  
6 you had with them?

7 MR. MacGILL: Wait. Just so the  
8 question -- you made a statement, so the  
9 question is what?

10 MS. NOKES: Would Guidepost not allow him  
11 to speak in the May 12th meeting he had with the  
12 investigators?

13 MR. MacGILL: Thank you.

14 A. After the way they ambushed me, who wanted  
15 to talk to them?

16 Q. (By Ms. Nokes) And what do you mean when  
17 you say "ambushed"?

18 A. Here's how the meeting came about. I had  
19 met with them in April. They had absolutely nothing  
20 to even hint of about the [REDACTED] Nothing. They  
21 say that they dropped statements that they thought I  
22 would jump on board with. If they will be honest,  
23 they will tell you that they asked me if I knew the  
24 pastor at Rehoboth Baptist where [REDACTED] had been.

25 I said, I just did his 10th anniversary

1 celebration. His name is Troy Bush. Had they wanted  
2 to know about the [REDACTED] they would have said, No,  
3 Mr. Hunt, 12 years ago. They did not do that. They  
4 stuck with that narrative. So I left that meeting.  
5 There's nothing mentioned. So there never was an  
6 opportunity to say: You had a chance to come clean.  
7 That is not a true statement.

8           So then they reached out to my secretary.  
9 I have 200 pastors in a room. I'm starting at  
10 9 o'clock. They want to know if I can get on a Zoom  
11 call at 9:00. And I'm thinking: I can't give up  
12 time. I have got 200 pastors I've got to go in. I  
13 can't do it right now. They assured me that all they  
14 wanted to do is just do a follow- -- couple of  
15 follow-up questions from my previous meeting.

16           When I went on the Zoom call, immediately,  
17 they both dove in, being in different places, and  
18 began to say, Tell us about the room that you rented  
19 for [REDACTED] [REDACTED] next to you. Tell us about how you  
20 assaulted her. So as they began to spew that out,  
21 and I said, no, I was not saying no to I was never  
22 there. I was saying no to this narrative that was  
23 such a lie that they had fabricated and ambushed me.

24           And then they were so kind enough to say,  
25 Now, you have two days. And now that I have listened

1 to depositions, they've already met with this couple  
2 11 times, 11 times probably over 50 hours. And if we  
3 can get a recording, if -- of the Zoom the day they  
4 met, they did not interview me for an hour. I was  
5 back in my meeting. At the most, that meeting was  
6 somewhere between 10 and 15 minutes.

7 And if the courts would order them to show  
8 that Zoom call in their computer, it would give the  
9 amount of time. I believe there's a video. But the  
10 video would support me. And that's why we will never  
11 see it. They literally ambushed me. I was so  
12 unsettled, I had to go in and ask someone to speak  
13 for me the next session because of the way they  
14 approached me. It was strictly nothing but  
15 accusation, one after another, one over the other.

16 Then in their kindness, if there's anything that you  
17 want to say that's different, you have 48 hours to  
18 call us. Well, if they have known this since

19 February, why don't I know it yet? So I look forward  
20 to the public becoming known as to how I was treated  
21 and how we will ever justify 50 hours with them,  
22 giving them questions they are going to answer. I  
23 was never given a question. They formulated a story,  
24 one-sided story.

25 They didn't believe that it could have been

1 a Potiphar's wife, a genesis 39, where maybe the  
2 woman was the one that was on the attack and not the  
3 man. And maybe I survived, getting out of there.

4 Q. But that --

5 MR. MacGILL: Just for the record, let me  
6 reiterate again, if you don't mind, we have been  
7 demanding for years this video. There has to be  
8 a video of this. It has not been produced. We  
9 want -- as Pastor Hunt indicated, we want the  
10 video. There is a video. We are certain of it.  
11 It's been denied by Guidepost repeatedly. We  
12 will ask again that the video be produced.

13 Second, we will ask again that the data  
14 showing the amount of time and when this  
15 conference took -- when this, quote, ambush as  
16 Pastor Hunt has testified to, occurred and the  
17 time period.

18 We ask that Guidepost produce both of those  
19 pieces of information into evidence to the  
20 counsel for the SPC and to counsel for the SPC  
21 executive committee as well as our client.

22 Sorry for the interruption.

23 MR. BESEN: So you are asking us to produce  
24 stuff that --

25 MR. MacGILL: No, I'm asking them to

1 produce that and to produce it to you and to us.

2 MR. BESEN: All right. Got you.

3 Q. (By Ms. Nokes) But, Mr. Hunt, what you  
4 referred to as the ambush is what prompted you to  
5 reach out to Dr. Kevin Ezell and resign without even  
6 working out a notice, correct?

7 A. There would not have been an opportunity  
8 for a notice.

9 Q. To NAMB?

10 A. Yes, I'm confident of that. Once --

11 Q. But this was May 13th.

12 A. My confession was -- because I did tell him  
13 what I did do. And I said, And to save you heartache  
14 of this report, whatever is going to be in it,  
15 because I never saw it until -- well, I was going to  
16 say you saw it, but I never saw it until the average  
17 person saw it. So when people were finding out what  
18 was in the report, I didn't know. And then to find  
19 out that [REDACTED] wrote the majority of my report is  
20 unbelievable.

21 Q. So for the sake of clarity in the record,  
22 what specifically did you tell Dr. Ezell in  
23 connection --

24 A. I told Dr. Ezell that I broke my own  
25 covenant with myself and that I went into a condo

1 with a lady that was not my wife and that I did touch  
2 her. And that I will grieve it till the day I died.  
3 But I have received counseling after that. I  
4 confessed it to everyone that would have been injured  
5 in it.

6 Charles Spurgeon, the most quoted pastor of  
7 the 21st century, he said that a confession should be  
8 as broad as its offense. Everyone that was offended  
9 in that situation, I went to personally. And when I  
10 went to [REDACTED] his wife had not told him. The  
11 information [REDACTED] got for probably months was  
12 whatever I could tell him because his wife would not  
13 tell him.

14 Q. It's your position that based on your  
15 account of what happened, that didn't offend the  
16 leaders of First Baptist Woodstock?

17 A. It was a personal matter between God and  
18 myself based on Psalms 51:4. "I have sinned against  
19 thee and thee alone." The church does not have a law  
20 that I can sin against. My sin was against God. And  
21 I had offended [REDACTED] and her husband and my wife.

22 Q. Do you think there's ever a time when --  
23 every sin is a sin against God, you agree?

24 A. Exactly.

25 Q. Do you think there ever a time when a



1 pastor sins and it's significant enough that church  
2 leaders need to be informed?

3 A. Let me say, to put it in its perspective,  
4 when I was in counseling, I was not -- I was not  
5 considering myself pastor at Woodstock. I was  
6 personally removing myself with no intention of ever  
7 going back.

8 And so I was making all the preparations  
9 for that. But I found healing through my counseling,  
10 through seeking forgiveness of those offended and  
11 with God. And I feel like I was restored by the  
12 person who called me. And so I think it was a  
13 private matter in my own heart. I believe to this  
14 day if I had been pastor at Woodstock when this came  
15 out, I would still be pastor at Woodstock. But it  
16 being set up the way it was, with an EC member being  
17 the pastor, he played along with the Guidepost story.

18 Q. And to be clear, you said earlier you -- if  
19 you could rewind the clock --

20 A. Yes.

21 Q. -- which none of us could do, you wouldn't  
22 handle any of it differently?

23 A. Afterwards?

24 Q. Yes.

25 A. Absolutely not. I'm totally content to

1 face God one day with the way I dealt with it, that I  
2 went to my wife. I got in my car and drove over to  
3 [REDACTED] He could have gotten angry and pulled a gun  
4 out and killed me. I would be willing to die to get  
5 it off my heart. And so I don't want anyone making  
6 light of something that was so serious in my heart.  
7 And then I gave myself to 16 weeks of intense  
8 counseling, sometimes eight hours a day to just, in  
9 my own heart, to make sure I reinsure the boundaries  
10 in my life.

11 Being a pastor and how I counsel people, I  
12 would counsel people to do exactly what I did. And I  
13 have talked to the leading pastors in America, the  
14 generation beyond me. And every one of them would  
15 say: I don't know what you should have done, under  
16 God, different than what you did.

17 Q. What did Kevin Ezell respond to you when  
18 you told him?

19 A. Kevin's greatest grief would be losing me.

20 Q. That's what he said or that's your  
21 perception?

22 A. That is my perception and he would say  
23 that. No one worked. The entire work force of NAMB  
24 came to an entire new level within my first year of  
25 being there. They've never seen anyone with the work

1 ethic that I brought to that place. Everyone had to  
2 start either adding more staff to even accommodate  
3 the work that I generated. And it was a -- it was a  
4 fresh new day.

5 NAMB had been under serious scrutiny at  
6 every Southern Baptist Convention until I came to  
7 place and I stepped up besides Kevin Ezell to do our  
8 annual report and there was not one single complaint.

9 Q. And you were still doing all of your  
10 individual Johnny Hunt Ministries things during the  
11 time you worked for NAMB?

12 A. There were very little time. I mean, if I  
13 were free on Sunday, but, normally, I was getting  
14 ready to do a conference that night. So the church I  
15 was going to be in just asked me to speak in the  
16 morning.

17 Q. Now, Mr. Hunt, you were aware before  
18 Guidepost ever reached out to you that the messengers  
19 in Nashville at the 2021 annual meeting had voted to  
20 create a task force to specifically look into issues  
21 related to sexual abuse, correct?

22 A. As it pertains to the EC.

23 Q. And other things, but the EC included.

24 A. Well, no, no, the --

25 MR. MacGILL: What's the -- hold on. What

1 is the question?

2 MS. NOKES: He's aware of the messengers'  
3 motion in 2021 to create a task force to  
4 investigate issues of sexual abuse within the  
5 executive committee and other --

6 THE WITNESS: I don't know about the other  
7 in there. A letter of engagement.

8 MS. NOKES: The credentials committee --  
9 the credentials committee process was part of it  
10 as well.

11 MR. MacGILL: Are you saying part of the  
12 investigation, Scarlett?

13 Q. (By Ms. Nokes) Were you aware of that?

14 MR. MacGILL: Do you understand what she's  
15 asking?

16 A. Well. I knew that -- I know that I was not  
17 an EC member, and I know they went outside of the  
18 letter of engagement.

19 Q. (By Ms. Nokes) You were not an EC member --

20 A. No, ma'am.

21 Q. -- in 2008 to 2010?

22 A. Oh, then. But this was after. This was  
23 July of 2010. I am no longer a member when they  
24 chose to include me. They violated their own letter  
25 of engagement.

1 Q. We will look at the letter of engagement.  
2 I will have to print it at lunch, and we will circle  
3 back around to that. But you were aware there was a  
4 motion that was approved by the messengers?

5 A. I was.

6 Q. So unlike your presidency, this is now a  
7 very big topic within the convention --

8 A. Correct.

9 Q. -- by 2021?

10 A. Right.

11 Q. And you were aware it went back all the way  
12 to the year 2000?

13 A. Correct.

14 Q. And you were aware that one of the aspects  
15 of the engagement was looking into abuse committed by  
16 executive committee members?

17 A. That was the majority of what they were to  
18 do.

19 Q. And it also involved how the executive  
20 committee handled allegations of abuse?

21 A. Exactly, uh-huh.

22 MR. MacGILL: You are referring to the  
23 engagement letter? It is the engagement letter;  
24 is that right?

25 MS. NOKES: The motion.

1 MR. MacGILL: I'm sorry. Okay.

2 Q. (By Ms. Nokes) How victims or survivors of  
3 abuse were treated?

4 A. Uh-huh.

5 Q. And patterns of intimidation?

6 A. Correct.

7 Q. You were aware of all of that?

8 A. Yes, ma'am.

9 Q. And you were aware that their findings  
10 would eventually be made public?

11 A. Correct.

12 Q. And just as a general matter, would you  
13 agree that instructing victims or survivors of sexual  
14 abuse to keep silent about their allegations is a  
15 form of intimidation?

16 A. Exactly.

17 Q. Did you know the members on the committee  
18 on cooperation?

19 A. I'm not sure who is on there.

20 Q. And based on your understanding of the  
21 engagement and the investigation, did you think they  
22 had any input into the report's findings?

23 A. I know that it read that when they --  
24 Guidepost finished and they gave it to them, they had  
25 so many days, maybe 10 days to ask questions as to

1 its verity and then make any recommendations.

2 Q. And same question about the sexual abuse  
3 task force. Are you aware there was a task force?

4 A. I am, uh-huh.

5 Q. And is it your understanding that they had  
6 any input into the investigative findings or the  
7 contents of the report?

8 A. Same.

9 Q. Same as --

10 A. Yes, ma'am.

11 Q. -- the committee on cooperation?

12 A. Correct.

13 Q. I want to talk in more detail about your  
14 interactions with the Guidepost investigators.

15 A. Okay.

16 Q. I call them interviews. You call them an  
17 ambush. We can agree to disagree on the terminology.

18 A. The first one was an interview.

19 Q. And that one was in person, correct?

20 A. Correct.

21 Q. On April 26th, 2022?

22 A. Right.

23 Q. Now, when did Guidepost first reach out to  
24 you wanting to interview you?

25 A. They never reached out to me. So they did

1 it through my office, and I'm not sure when they  
2 arranged with them.

3 Q. And is that typical? You are a busy man.

4 A. Uh-huh.

5 Q. You have a full calendar?

6 A. Yes, that's normal.

7 Q. Do you normally have staff, administrative  
8 staff schedule or handle everything?

9 A. Correct. I do.

10 Q. And did your scheduler bring the request  
11 for a Guidepost interview to your attention?

12 A. I don't remember her doing that, but most  
13 likely she looked and thought: He's here, he's  
14 there, and here's the first time he can do it.

15 Q. And when do you remember first being  
16 contacted directly about Guidepost wanting to talk to  
17 you?

18 A. I have no idea.

19 Q. Do you remember who it was?

20 A. No, again it would have been through my  
21 secretary.

22 Q. Okay. And when you finally scheduled for  
23 April 26th, in that interview, was it Russell Holske  
24 and Samantha Kilpatrick?

25 A. It was, yes.



1 Q. And did one or both of them tell you that  
2 Guidepost was running the investigation?

3 A. I don't remember.

4 Q. Do you remember if they told you that  
5 Guidepost was in control of the contents of the  
6 report?

7 A. I would -- I don't recall it.

8 Q. Did they tell you that they were operating  
9 independently of the convention and the executive  
10 committee?

11 A. I would have known that just from reading  
12 their report.

13 Q. Did they tell you that their findings would  
14 be made public?

15 A. I don't remember.

16 Q. Do you remember in your communications with  
17 them telling them that you could only give them 90  
18 minutes?

19 A. I know I was speaking that day, so that  
20 makes sense.

21 Q. Did you want to talk to Guidepost?

22 A. No.

23 Q. What were your thoughts and feelings about  
24 the entire process, the motion and the process that  
25 lead to the Guidepost investigation?

1           A.     The reason I did not want to speak with  
2     them is they said they wanted to talk to me about  
3     particulars of my leadership for the convention.  
4     There's a reason that 10 years, what details did I  
5     remember when that was just a smidgen of all the  
6     things I was doing as pastor of one of the largest  
7     churches in America.   And I thought: I can't -- I  
8     don't know that I can be any help to you.

9           So then Ed Litton had called me, being a  
10    personal friend, being the president at that time,  
11    encouraged me to meet with them, but then said this:  
12    Whatever you do, don't bring a lawyer.   Ronnie Floyd  
13    did, and that was so stupid.   You do not need a  
14    lawyer.   I needed a lawyer to meet with Guidepost.

15           Q.     Why?

16           A.     Because they ambushed me.   I think my  
17    attorney could have helped me to maneuver that, and I  
18    would have a witness there with me.   Because we have  
19    already found that Ms. Kilpatrick said when she asked  
20    me in the first interview if I knew the couple, I  
21    denied it.   And that went out to the whole world.  
22    And some of my best friends said:   Johnny as much as  
23    we love you, the fact that you denied knowing them,  
24    you lied.   And then Ms. Kilpatrick, in deposition,  
25    under oath, acknowledged that I didn't lie.   She

1 lied. She did not ask me. And that did so much  
2 damage to me. Deeply wounded me among friends out  
3 there. That's where it started. So you can only  
4 imagine how now the second goes since they've already  
5 got their story and have become such good friends  
6 with the [REDACTED]

7 Q. Mr. Hunt, today, your recall of that  
8 counter is very specific and detailed. Is it your  
9 testimony that in the first Guidepost interview, your  
10 encounter with Jane Doe never crossed your mind  
11 during Guidepost questions?

12 A. Never. There was no reason for it to cross  
13 my mind. It was 12 years removed. And the reason my  
14 mind is so good on this as opposed to the SBC is  
15 because I live with this every day. I go to bed with  
16 it every night, what Guidepost did to me. And I wake  
17 up with it every day, the lies that they told about  
18 me. And so I will deal with that for the rest of my  
19 life. That's why I pay for my own counseling, to go  
20 to one of the world-renowned counseling centers to  
21 deal with the trauma of this report.

22 And so, yes, I wake -- and my wife does  
23 too. For months my wife cried herself to sleep every  
24 night because she knew I had given my confession.  
25 She knew I had gone to [REDACTED] office at my risk to

1 tell that man what I had done. So she knew the truth  
2 when it came. So we thought when it came out, we  
3 would just hear the same story. But the story  
4 Guidepost wrote and the story the [REDACTED] have told  
5 is not a true story. And I plan to give my life to  
6 the end to prove the lie that they perpetrated on me.

7 Q. You talked about going to bed and waking up  
8 with the weight of the Guidepost report. How often  
9 does being unfaithful to your wife weigh on you?

10 A. I dealt with that and received God's  
11 glorious great forgiveness, the same one that every  
12 Southern Baptist church preaches in the gospel every  
13 Sunday, that God forgives us, cleanses us, gives us a  
14 second chance. He never even mentioned -- every time  
15 he mentioned David in the New Testament, it was in a  
16 beautiful light of him doing the will of God, even  
17 though he had committed adultery, which I did not  
18 commit adultery. And so there's forgiveness.

19 If Johnny Hunt can't be forgiven, I don't  
20 see how anyone that we preach the gospel to can be  
21 forgiven. So I'm not here today just for myself.  
22 I'm here to help preachers that will come behind me  
23 and the ones that are out there struggling right now  
24 that maybe couldn't afford to engage someone like  
25 Guidepost when they perpetrate lies on you and to

1 stand your ground and to tell the truth.

2 And it's so easy to speak today because  
3 it's so in my heart and it's been there for so long  
4 of what they have done to me.

5 Q. So is it fair to say that the encounter  
6 from July 2010 doesn't weigh on you at all at this  
7 point?

8 A. No, that would not be a true statement.

9 Q. How does it weigh on you?

10 A. But compared to -- it weighs on me in that  
11 I know that I crossed the line, and I have been  
12 willing to say: I own that. I confess it. I take  
13 full responsibility, but I am so grateful for God's  
14 forgiveness.

15 Q. And you said that it didn't cross your mind  
16 at all during the first interview with Guidepost, but  
17 the investigators focused a lot of their questions on  
18 the summer and fall of 2010; is that correct?

19 A. Absolutely not.

20 MR. MacGILL: Scott knows how to get it  
21 going again.

22 A. Now, I don't recall anything about -- I  
23 mean, 2008 to 2010 about me being the president, like  
24 did you get a letter from Christa Brown or remember  
25 things like that.

1 Q. (By Ms. Nokes) Did they ask whether you  
2 were under the care of Roy Blankenship?

3 A. I don't remember that at all. Absolutely  
4 not.

5 Q. Other than dealing with the aftermath of  
6 your encounter with Jane Doe, did you go to  
7 Mr. Blankenship for counseling at any other time?

8 A. No.

9 Q. And to be clear, he was an employee of  
10 Woodstock Baptist Church, correct?

11 A. He was, and I'm not sure when that divided  
12 that he actually -- then he was not. He was -- he  
13 had started Hope Quest, and he was no longer an  
14 employee in First Baptist Church Woodstock in 2010.

15 Q. And they asked about Jane Doe's husband's  
16 church. You mentioned that because you --

17 A. Uh-huh.

18 MR. MacGILL: Again, we are referring to an  
19 April 26, 2022 interview?

20 MS. NOKES: The first interview.

21 MR. MacGILL: I just want to make sure.

22 Q. (By Ms. Nokes) They asked you about the  
23 church where Jane Doe's husband had been the lead  
24 pastor?

25 A. Correct.

1 Q. And did you ask where the church was  
2 located?

3 A. No, they didn't ask me in that context.  
4 You mentioned [REDACTED] [REDACTED] but they didn't mention  
5 their names or anything with it. They asked me if I  
6 was aware of a pedophile from like 15 years prior or  
7 something. I said, never heard -- never heard about  
8 that. And they said, Yes, they had a pedophile. And  
9 then they said, Do you know the pastor there? And  
10 then I went into a long explanation: Yes, Troy Bush.  
11 Troy just celebrated his 10th anniversary today.  
12 Wanted me to come and speak, but I couldn't, but I  
13 did a video for him. That would have been a perfect  
14 time to say no. Pause: We are talking about 2010.  
15 They did not do that. There was no hint. So I had  
16 no reason to -- something to come to my mind that was  
17 12 years old that I -- that I dealt with.

18 Q. So it's your testimony they did not ask you  
19 about the lead pastor abruptly leaving the church in  
20 2010?

21 A. If they did, I don't recall that in this  
22 deposition.

23 Q. And wouldn't that have prompted you to  
24 remember this encounter that weighs on you?

25 A. Yes. If they would have brought it up like

1 that, like did you know the pastor that left there in  
2 2010? I would have said, Yes, I -- I guess if it was  
3 2010, I would have said, Yes, that would have been

4

5 Q. Did Guidepost, in the April interview, ask  
6 you about your sabbatical from the summer of 2010?

7 A. They may have, but if they did, I don't  
8 remember any details as to what they were fishing  
9 for.

10 Q. And why did you extend your sabbatical in  
11 2010?

12 A. Because that's when it happened. And so  
13 when it happened, I was entertaining not returning to  
14 Woodstock. So I was trying to get my spiritual  
15 equilibrium. So in that, that's when I called Roy.  
16 And Roy came to where I was and spent a day with me,  
17 and that's in the report. And I spent a day with  
18 him, eight hours, and just sharing with him what I  
19 had done and that I'm really thinking about stepping  
20 away. And that's just when the counseling process  
21 began.

22 And so that continued over the next 15 or  
23 16 weeks. So I just basically said to Woodstock:  
24 I'm not in a good place. But I had already said two  
25 weeks prior, that's been on record for a long time,



1 that something inside of me had died, anyway, before  
2 all of this happened. I had just come out of a bout  
3 with cancer. I'm the president of the largest  
4 evangelical body in America. I'm pastoring one of  
5 the largest churches in America and I'd hit a wall.

6 And so I was not at my best. I'd like to  
7 believe that if I had been at my best, I would have  
8 never gone to that balcony. So I'm not going to even  
9 say that for -- as an excuse. I'm just telling a  
10 fact, a story. I think people that love me would  
11 like to know what all was going on in my life at that  
12 time that made it a little different in my life. Why  
13 would I accept her invitation, her consensual  
14 invitation to come next door, her consensual offering  
15 herself to me?

16 Q. So to be clear, the sabbatical, the  
17 extended sabbatical in 2010 related directly to your  
18 encounter with Jane Doe from July of 2010?

19 A. I can't say that exactly. Because if I  
20 could not have gotten back to the place where I  
21 didn't feel dead inside, I wouldn't have been going  
22 back then either. So I already had something going  
23 on that my wife is aware of and that I told her two  
24 weeks previous and then this certainly added to that.

25 Q. And you don't recall being asked about your

1 extended sabbatical in your first Guidepost  
2 interview?

3 MR. BESEN: Why don't we go off the record.

4 THE VIDEOGRAPHER: The time is 11:35 a.m.

5 (WHEREUPON, a recess was taken 11:35 a.m. -  
6 12:50 p.m.)

7 THE VIDEOGRAPHER: We are back on the  
8 record. The time is 12:50 p.m.

9 Q. (By Ms. Nokes) All right. Mr. Hunt, we  
10 talked a little about the second meeting you had with  
11 the Guidepost investigators. That was May 12th,  
12 2022, correct?

13 A. Yes, ma'am.

14 Q. And you were at a conference?

15 A. I was in Lake Tahoe leading a Timothy  
16 Barnabus conference.

17 Q. Did you talk to anyone outside of Guidepost  
18 about that follow-up meeting?

19 A. You mean before the meeting took place?

20 Q. Yes.

21 A. No, I just -- I mean, they didn't call  
22 until either -- they either called late that night,  
23 the night before, or that morning for the meeting. I  
24 mean, it was like I'm just being -- I mean, I was not  
25 aware of the meeting when I got to that conference.

1 Q. And what's your recollection of what time  
2 the meeting -- and we are calling it a meeting. It  
3 was a virtual setup, right --

4 A. Correct.

5 Q. -- on Zoom or Teams?

6 A. Yes, ma'am. Zoom.

7 Q. Do you recall what time the meeting was  
8 scheduled for?

9 A. I'm fairly confident it was at 9 a.m.  
10 because I had to get someone to get my meeting  
11 started. We normally start at 9:00, and then I went  
12 and joined the meeting afterwards.

13 Q. And who was in that meeting?

14 A. Two hundred pastors.

15 Q. I'm sorry, the meeting with Guidepost.

16 A. Oh, that would have been Holske and  
17 Kilpatrick.

18 Q. I'm going to mark as Defendants' Exhibit 10  
19 a document you may not have seen before this time.  
20 It's been previously marked attorneys eyes only.  
21 This will be designated.

22 (Defendants' Exhibit 10, Notes of Guidepost  
23 Investigators, 5/12/22, 12:15 ET, marked for  
24 identification.)

25 Q. (By Ms. Nokes) Mr. Hunt, these are notes of

1 the Guidepost investigators from that May 12th  
2 meeting with you. Do you see --

3 MR. MacGILL: Counsel, I just want an  
4 administrative question. We have made our  
5 objections known about the conduct of counsel in  
6 connection with this, and we will address that  
7 by separate motion practice. But you --  
8 Guidepost has produced either 15 or 16 different  
9 versions of this document. Can you tell us, is  
10 this the latest -- is Exhibit 10 the latest of  
11 the 15th or 16 versions?

12 MS. NOKES: I can tell you that it's Bates  
13 labeled Guidepost 009986.

14 MR. MacGILL: Is this the first, fifth  
15 tenth, eleventh, 15th version?

16 MS. NOKES: It's not my document.

17 MR. MacGILL: Don't know?

18 MS. NOKES: Don't know.

19 MR. MacGILL: Okay. Fair enough.

20 MS. NOKES: It appeared to be a complete  
21 summary from the May 12th meeting with Mr. Hunt.

22 Q. (By Ms. Nokes) Mr. Hunt, you see at the top  
23 that it has you listed as the interviewee?

24 A. Yes, ma'am.

25 Q. The second line is the date. The third

1 line, interviewers, correct?

2 A. Yes, ma'am.

3 Q. And then it has 12:15 Eastern time?

4 A. Has what time?

5 Q. 12:15 Eastern time.

6 A. Right. And we were West Coast. That would  
7 be 9:00.

8 Q. Well, would it be 9:15, you were --

9 A. Yes, ma'am. It would be three hours  
10 earlier.

11 Q. So not Mountain time --

12 A. It's West Coast time.

13 Q. -- but Pacific?

14 A. Uh-huh.

15 Q. And then there's a note following those  
16 introductory comments that your responses to their  
17 questions are in bold. Do you see that?

18 A. I do.

19 MR. MacGILL: Well, hold on a second. What  
20 it says is Dr. Hunt's responses are in bold.  
21 Right? You said to questions. It doesn't say  
22 questions.

23 MS. NOKES: I don't --

24 MR. MacGILL: And, further, you lack a  
25 foundation in terms of the witness's knowledge

1 of this document.

2 Q. (By Ms. Nokes) Forgive me for misreading  
3 line Number 5 that your responses are in bold.

4 A. Uh-huh.

5 Q. Do you see that?

6 A. Yes, ma'am.

7 Q. And do you see just below that, it says,  
8 Dr. Hunt was a very calm interviewee. He expressed  
9 little emotion, did not get upset or raise his voice  
10 or express outrage at the serious allegations at  
11 hand. Interviewers presented the allegations of  
12 abuse several times and explained that there were  
13 several corroborating witnesses. This did not change  
14 Dr. Hunt's demeanor. So I have two questions related  
15 to that: One, do you agree with how they  
16 characterized --

17 A. Abs- -- sorry.

18 Q. -- your demeanor?

19 A. Absolutely not.

20 Q. So you were not calm?

21 A. No.

22 Q. You did express a lot of emotion?

23 A. I was expressing, as they got into their  
24 questions: That is not true. That is not true.  
25 They continued to talk.

1 Q. Did you get upset or raise your voice?

2 A. I don't know that I raised my voice. I was  
3 upset.

4 Q. Did you express any outrage?

5 A. No. It was -- it was such an attack and it  
6 was such a surprise. And -- and I guess, you know,  
7 one thing about this interview being the last of the  
8 dates or my wife being the last tomorrow, since I've  
9 heard all the depositions and realized what they did  
10 before they met with me that day, I'm having a hard  
11 time not being outraged right now.

12 Q. And I hear you. But I want you to be  
13 precise in your answers.

14 A. Okay.

15 Q. You have had the benefit of hearing what  
16 all the other witnesses have said.

17 A. Uh-huh.

18 Q. I'm going to ask you to go back --

19 A. Okay.

20 Q. -- to May 12th, 2022, and tell me, based on  
21 your own recollection, what happened and what in here  
22 is accurate versus inaccurate?

23 MR. MacGILL: Well, we are not going to do  
24 that. You will not -- I'm going to instruct him  
25 not to answer any questions or you are going to

1 ask him to go through this document. It's an  
2 outrage. It's an absolute outrage, what you've  
3 done. We are going to pursue sanctions,  
4 certainly against Guidepost and maybe against  
5 the SBC and the executive committee. This  
6 document has been withheld from Pastor Johnny  
7 Hunt for years, right? Years. And what time  
8 was it last night, Gene, when you-all sent this  
9 to us? Four o'clock? You sent us 31 versions  
10 of, quote, interview notes at 4 o'clock  
11 yesterday that this gentleman, our client, has  
12 never seen, okay? So sanctions are appropriate  
13 here, in my judgment. Whether you-all are going  
14 to be the objects of sanctions or just  
15 Guidepost, we don't know yet.

16 But for you now to proceed with this  
17 witness and ask him to go -- talk to you about  
18 this document is an outrage. And it's wrongful.  
19 So we will do -- we will do one step at a time,  
20 but let me ask first: Counsel, will you state  
21 on the record why it is you held this document  
22 after April 4th? Can you tell us?

23 MR. KLEIN: Rob, I'm not going to have that  
24 discussion with you now, Rob. I'm happy to have  
25 that discussion with you, Rob, off the record



1 and afterwards. I'm happy to have a calm  
2 discussion about that.

3 MR. MacGILL: This is -- this is -- this  
4 is --

5 MR. KLEIN: I don't think it's appropriate  
6 now to have that discussion.

7 MR. MacGILL: This is your -- this is your  
8 chance.

9 MR. KLEIN: Let me finish.

10 MR. MacGILL: All right.

11 MR. KLEIN: Let me finish, Ron. And waste  
12 this time that your client has been waiting 23  
13 months for. We will have the opportunity -- I'm  
14 not talking to you, Rob. We will have the  
15 opportunity -- this is not the appropriate time.  
16 I will address anything you have to raise if you  
17 are going to make a motion. I can never stop  
18 you from doing that other than meeting and  
19 conferring beforehand. This is not the time to  
20 do this. This is a document that Ms. Nokes is  
21 showing the client, showing your client, and  
22 they should discuss it.

23 MR. MacGILL: Counsel of the SBC, could you  
24 justify why this document was held after  
25 October 4th?

1 MR. BESEN: We are not going to be having  
2 conversations on the record. We're not going to  
3 do that. You can object to form. We are going  
4 to ask our questions, and we are going to start  
5 now. That's where we are going to leave it.

6 MR. MacGILL: Counsel for the executive  
7 committee, and you are speaking for the SBC and  
8 the executive committee.

9 MR. BESEN: I'm telling you we are going to  
10 move forward with our deposition.

11 MR. MacGILL: All right. So, counsel, I  
12 want to give everybody a chance to answer on the  
13 record. So counsel for the SBC executive  
14 committee, can you say -- can you give any  
15 reason to this Court on this record now why you  
16 did not turn this document over previously and  
17 certainly after October 4th?

18 MR. BESEN: You mean the document that's  
19 not ours and not in our possession?

20 MR. MacGILL: It was in your possession.

21 MR. BESEN: How?

22 MR. MacGILL: At all times this was in your  
23 possession.

24 MR. BESEN: That document?

25 MR. MacGILL: Yes.

1 MR. BESEN: Guidepost notes were in SBC's  
2 possession?

3 MR. MacGILL: They were.

4 MR. BESEN: Really?

5 MR. MacGILL: In this case, they were. You  
6 have had them -- how long have you had them?

7 MS. NOKES: They were produced in  
8 discovery --

9 MR. MacGILL: Right.

10 MR. BESEN: -- to all of us. So we haven't  
11 seen them yet.

12 MR. MacGILL: Right. I just want you to  
13 tell me, Can you justify from the SBC on this  
14 record any reason why you withheld Exhibit --  
15 these 31 exhibits?

16 MR. BESEN: Rob, stop.

17 MR. MacGILL: This is your chance.

18 MR. BESEN: This is ridiculous.

19 MR. MacGILL: No, it is not.

20 MR. BESEN: It is the most asinine thing I  
21 have ever seen a lawyer do, Rob.

22 MR. MacGILL: This is your chance.

23 MR. BESEN: We are not having a discovery  
24 hearing.

25 MR. MacGILL: We are having a

1 meet-and-confer right now.

2 MS. NOKES: Can we go off the record?

3 MR. MacGILL: No, we are not going off the  
4 record. We do not consent. If you tell us  
5 now --

6 MR. BESEN: Okay. Well, have your client  
7 walk out, and why don't you guys go.

8 MR. MacGILL: No.

9 MR. BESEN: And we will reschedule him.  
10 And we'll interrupt one of his -- unless he  
11 agrees for us to take his deposition.

12 MR. MacGILL: This is your chance. Would  
13 you explain to the Court why you withheld this  
14 document and now you are proceeding to question  
15 him about it? Can you offer anything?

16 MR. BESEN: Just ask him the question.

17 MS. NOKES: The document was not withheld.  
18 You've had it. We can do the questions without  
19 the document. You know, we have waited a long  
20 time to take this deposition as well. We have  
21 been noticing it for many, many months. So we  
22 are all glad to be here today, finally. I can  
23 ask the questions without him having the  
24 document as a reference.

25 MR. MacGILL: I'm not to -- you do what you

1 want to do in your deposition. All I'm asking  
2 for my purposes of my motion for sanctions is if  
3 you have any reason to justify your withholding  
4 this document prior to last night. You had it.  
5 Guidepost had it. And I just wanted a statement  
6 on the record. I don't want a he said/she said,  
7 it's on the record. Is there any  
8 justification --

9 MS. NOKES: It is not a document the  
10 executive committee or the Southern Baptist  
11 Convention produced and had no control over the  
12 designation.

13 MR. MacGILL: Okay. Ask your questions.

14 Q. (By Ms. Nokes) Mr. Hunt, when -- when asked  
15 by the investigators if you knew why they were coming  
16 back for a second meeting with you, do you recall  
17 being asked that, first of all?

18 A. I do.

19 Q. And what was your response?

20 A. I had no idea.

21 Q. You were told that there was an allegation  
22 of sexual abuse against you; is that correct?

23 A. I know they are going to bring up an  
24 allegation, but I don't know if they asked questions.  
25 They weren't much on asking questions. It was

1 accusations.

2 Q. Did they tell you you had been accused of  
3 sexual abuse?

4 A. They would have done it more like this.  
5 You went into a ladies room and touched her, didn't  
6 you? You abused someone. You rented the room to  
7 bring her here. And I'm saying, No, no, no. And it  
8 was very brief. They may have a lot of questions.  
9 They did not ask this many questions. I pray God we  
10 can find the video to prove that.

11 Q. And do you recall saying you were totally  
12 in the dark about any allegations of abuse?

13 A. I don't remember saying that.

14 Q. Were you told the name of the accuser who  
15 we've been --

16 A. Yes.

17 Q. -- referring to --

18 A. Yes.

19 Q. -- as Jane Doe today?

20 A. Yes.

21 Q. And, of course, you knew her?

22 A. I did.

23 Q. Did any light bulbs go off in that moment  
24 once you heard her name?

25 A. Yes. Once I heard her name and then the

1 context they said it, I was scared to say anything  
2 else to them.

3 Q. What were your options at that moment when  
4 they identified her and made an accusation?

5 A. My options were to continue down the road  
6 of their false allegations mixed with some truth or  
7 for me to simply say in my heart, I don't want to  
8 talk to these people. And that's what I chose to do.

9 Q. So you didn't answer any questions?

10 A. So I began to say, No, no, no. And the nos  
11 were still in a narrative form. And I really believe  
12 the reason they are hiding the video is in the video,  
13 you will see where they are asking the questions and  
14 I'm saying No. But it's all framed within the  
15 context of a false narrative. I rented a room, I  
16 assaulted a lady. No, it's nothing about the  
17 consensual relationship that really happened. So  
18 with that being said, so did I deny some things in  
19 the fear of them being there? So look forward to our  
20 Southern Baptist Convention hearing that how many  
21 times they met before they confronted me, two days  
22 before the report. Forty-eight hours, I'm 17 hours  
23 from home, at 48 hours, and it's a weekend? And then  
24 the report's out on me. So I'm a sitting duck. And  
25 that's exactly what they planned. That's exactly

1 what Guidepost did, and that's what I'll testify to a  
2 jury.

3 Q. And if you will turn, Mr. Hunt, to Page 4  
4 of the document in front of you. Four lines down,  
5 you see there's a note. So you never had any  
6 physical contact with Jane Doe? And the response in  
7 bold is, Absolutely not.

8 MR. MacGILL: Where are you, Counsel?

9 THE WITNESS: On Page 4. Fourth line.

10 MR. MacGILL: Okay. Sorry. Could you say  
11 that again?

12 Q. (By Ms. Nokes) So the question from  
13 Guidepost, So you never had any physical contact with  
14 Jane Doe? And the response in bold, Absolutely not.

15 My question is, do you recall being asked  
16 that by the Guidepost investigators?

17 A. It was brought up in their -- in the  
18 context of their barrage of the wrong narrative.

19 Q. And do you recall answering "Absolutely  
20 not" to the question?

21 A. I would have said "Absolutely not."

22 Q. To the question about having any physical  
23 contact?

24 A. To the narrative they presented, not to the  
25 question.



1 Q. Well --

2 A. We are staying in a narrative that they  
3 have started, which is a false narrative.

4 Q. Well, let me ask you a specific question.

5 A. Okay.

6 Q. Do you recall them asking if you had any  
7 physical contact with Jane Doe? Using her real name?

8 A. I remember that in the context of the false  
9 narrative. Of lining up a narrative: You rented a  
10 room next door. You went in and sexually abused this  
11 lady. No, I did not. I was invited into her room.  
12 She made herself available to me. In a moment of  
13 weakness and temptation, I responded. I wish to God  
14 I never had. That's the way it happened. That's  
15 what I would have told them. If they had been kind  
16 enough to send me questions like they did them. And  
17 I can hardly wait to let my Southern Baptist family  
18 know how many interviews they did, questions sent  
19 before, and the ambush they did to me. And that the  
20 report was already finished when these questions were  
21 being asked.

22 Q. Mr. Hunt, I'm going to ask you one more  
23 time.

24 MR. MacGILL: He's answered your question.

25 Q. (By Ms. Nokes) Were you asked --

1 MR. MacGILL: He's answered your question  
2 twice.

3 MS. NOKES: No, he hadn't.

4 MR. MacGILL: All right. Answer it a third  
5 time. Listen to it, the question.

6 THE WITNESS: Okay.

7 MR. MacGILL: We'll answer it a third time,  
8 and then we are done with this question.

9 Q. (By Ms. Nokes) Were you asked by  
10 Guidepost's investigators on May 12th, 2022, if you  
11 had any physical contact with Jane Doe?

12 A. I was asked that question in the context of  
13 a false narrative that added so much more that didn't  
14 happen, and that was just part of it. So I was  
15 denying the narrative of the whole thing to do with  
16 them. If they had started with me with honest  
17 questions, I would have been delighted to speak then,  
18 so.

19 Q. And what was your response to the question,  
20 Did you have any physical contact with Jane Doe?

21 A. In the context of them lying, to start  
22 with, and giving a false narrative, my answer was No.

23 Q. And were you asked if you ended up being on  
24 the same balcony with Jane Doe?

25 A. I don't remember.

1 Q. Were you asked if you ended up being in the  
2 same condo unit as Jane Doe?

3 A. I'm sure they asked me.

4 Q. And what was your response to that?

5 A. But -- well, my no is they were speaking  
6 over me. My answer was no because it still stayed  
7 within the same narrative.

8 Q. So your answer was no to the question, Were  
9 you ever in the same condo unit?

10 A. As pertains to the narrative as they  
11 presented it.

12 Q. Do you recall saying that you were ready to  
13 face the judgment seat of Christ with her allegation?

14 A. I don't remember saying that.

15 Q. Do you recall saying that it was not true,  
16 absolutely not, you had no contact with Jane Doe  
17 whatsoever?

18 A. Boy, I sure wish they'd produce their  
19 video.

20 Q. That's not a response to my question.

21 A. So I'm going to make sure I understand your  
22 question. You've got -- is the question here that  
23 you are asking me?

24 Q. The question is, Do you recall saying to  
25 Guidepost investigators that it was not true,

1 absolutely not, you had no contact whatsoever?

2 Again, the contact would have been with Jane Doe.

3 A. I could have said that because I wasn't  
4 giving those people the benefit of the doubt to get  
5 anything out of me.

6 Q. The benefit of the truth?

7 A. No, that wasn't the truth. Well, the  
8 truth, yes, but the truth in a narrative that's  
9 proper. Because if there's a truth, did I abuse  
10 somebody? Absolutely not. Is there a truth that I  
11 had a consensual relationship by a lady that stalked  
12 me by coming to where I live and seduced me within  
13 the context of my own home. Yes, to that. But I  
14 want to keep it -- I finally get to tell my side of  
15 the story. And this is -- if I'm not telling them  
16 anything, I'm saying no to them. And if -- you write  
17 it down as a lie because I'm not willing to say it in  
18 the context of their narrative, that's the facts.

19 Q. Because you did have physical contact?

20 A. I did have physical contact. And I have  
21 confessed that, put it in a letter, put it out to the  
22 Southern Baptist Convention. And that's the story,  
23 and it never changed. It's the story my wife heard.  
24 It's the story I told her husband because she did not  
25 tell her husband. She continued to stay there. And

1 if you want to know the story, the next day she was  
2 not just there, but she came and sat in front of my  
3 wife and I with a bikini and took the -- her top  
4 loose and laid counter to where we were laying, in  
5 front of us.

6 And then my wife will give the testimony  
7 tomorrow, since she was there, as to what she did the  
8 next day -- or that same day when they went upstairs.  
9 So this is a lady that's abused. She's now down  
10 there wanting to go for a walk with me, laying on a  
11 chair in front of us, wanting to know what we are  
12 going to do for dinner together that night and has no  
13 intentions of leaving and has not told her husband  
14 anything.

15 Q. Did you say anything to the Guidepost  
16 investigators about the physical contact being  
17 consensual?

18 A. I don't think I was ever given the  
19 opportunity and certainly not asked the question.

20 Q. Do you recall being asked about whether you  
21 said, Praise Jesus, I did not consummate the  
22 relationship?

23 A. In this meeting?

24 Q. Yes.

25 A. I denied even having a meeting with those

1 people. So that doesn't even make sense.

2 Q. You remember being asked that?

3 A. No, I don't remember that. Of being -- it  
4 was not a question, it was a statement that I said  
5 Praise Jesus.

6 Q. Did Guidepost ask you if Mrs. Hunt would be  
7 willing to talk to them?

8 A. I don't remember being asked that question.

9 Q. Did you tell the Guidepost investigators  
10 that there had never been any physical intimacy?

11 A. In the context of their narrative, yes, I  
12 would have -- I would have -- I denied everything in  
13 the context of the way they framed it. I have rented  
14 her a room. It looks like an affair that I have  
15 scheduled and lined up. So everything became false  
16 within the context of that narrative. If you took it  
17 in the context and I was given the benefit, as a  
18 southern Baptist like their southern Baptist, to have  
19 been questioned the way they were questioned and my  
20 story taken as a friend the way theirs was taken, I  
21 would have been able to answer them as much as I've  
22 attempted to answer every one of your questions.

23 But looking back on this from 14 years  
24 ago -- in three months, it will be 14 years ago, the  
25 questions you are asking me -- and I have noticed how

1 a lot of even the attorneys are having trouble  
2 answering questions from 15 months ago. And this is  
3 14 years ago. So to know exactly what they asked me,  
4 I just remember how it came as a form of an ambush.  
5 The accusation was not -- it was not asking me the  
6 question; it was making the accusation of what I did.  
7 And that's what I was fearful of responding to and  
8 thinking: I don't want to say any more than I need  
9 to. And that's where I wish Ed Litton had never  
10 said, You don't need an attorney. I needed an  
11 attorney dealing with these attorneys.

12 Q. And, Mr. Hunt, it might have been almost 14  
13 years ago, but today you have recalled in great  
14 detail the encounter you had with Jane Doe.

15 A. And I am right now. I'm continuing to have  
16 great recall. My great recall is: They framed  
17 this -- I'll say it over and over again -- they  
18 framed this in a way: You did this. You assaulted  
19 her. You rented her that place. You arranged all of  
20 this. No, I didn't. No, I didn't.

21 She showed up and shocked me. And when she  
22 showed up, I'll never forget as long as I live:  
23 She's texting me and she hasn't even taken her  
24 luggage off the luggage rack. The luggage rack is in  
25 her room, which you're not supposed to take them in

1 your room. I have lived there 15 years. She's not  
2 even unpacked yet. She had one agenda: To come down  
3 there and stalk me and attempt to seduce me. So,  
4 yes, if you want to put it in that framework, I will  
5 tell you how I responded in that narrative. But I'm  
6 telling the truth of the narrative. To remove the  
7 narrative would not be telling the truth of how the  
8 questions -- and whether they were questions or  
9 accusations.

10 Q. And was it the truth when you denied any  
11 physical contact with Jane Doe?

12 MR. MacGILL: Objection. Assumes a fact  
13 not in evidence.

14 A. In the context.

15 Q. (By Ms. Nokes) It was the truth?

16 A. It was the truth in that I could -- I'm not  
17 going to say I touched her with them because they  
18 have set it up as a scenario that is a lie. So they  
19 have put an element of truth within a whole  
20 contextual lie. And I wasn't willing to buy into the  
21 lie. So I just said no, and they were continuing to  
22 ask the questions. Two of them against me in their  
23 ambush.

24 Q. How long do you think this meeting with  
25 Guidepost lasted?



1           A.     It would take one -- it would take one  
2     action to find out. For her to produce her computer  
3     and go to that date in her computer and it will show  
4     how much time she spent. I'm going to say 15  
5     minutes. And I look at all of these questions, you  
6     can -- you can rattle these off in accusations, but  
7     not -- not in this.

8           Q.     And, again, Mr. Hunt, I'm just asking about  
9     your recollection. Do you recall about how long this  
10    meeting lasted on May 12th, 2022?

11          A.     I think around 15 minutes.

12          Q.     And you are a very articulate man. You  
13    would have been able to articulate, even in the  
14    context of what you are calling a false narrative,  
15    that any touching, any sexual activity was  
16    consensual, correct?

17          A.     Uh-huh, correct. And it's all her -- also  
18    her testimony that it was consensual.

19          Q.     What did you do in the immediate aftermath  
20    of the May 12th interview?

21          A.     Came home, knowing that I had been set up.  
22    Knowing that I was the fall guy for Guidepost. For  
23    the millions that the convention was going to spend,  
24    they needed somebody, and they had nobody else, and  
25    now I realize that. No one, no one, not one. And so

1 they had found a guy, and they had not only found  
2 one, they found one that everyone in the convention  
3 knew. And not because I had been the president but  
4 because I had addressed that convention 20 years in a  
5 row, which speaks of the integrity of my life up  
6 until this one thing.

7 And I'm grateful that 20 minutes does not  
8 define an entire person's life. And that's what  
9 Guidepost would like for me to believe. It's what  
10 the Southern Baptist Convention would like for me to  
11 believe, and that's the way I have been treated is I  
12 don't have a life beyond Guidepost's report.

13 Q. And who was the first person after the  
14 May 12th meeting that you talked to?

15 A. My wife.

16 Q. And what was the context of that  
17 conversation?

18 A. The context was: What happened --

19 MR. MacGILL: Hold on. Hold on. Hold on.  
20 You may not ask about the conversations with his  
21 wife.

22 MS. NOKES: I asked the context, not the  
23 substance.

24 MR. MacGILL: Okay. He had a conversation  
25 with his wife. Move on. Nothing further.

1 Q. (By Ms. Nokes) Was she in Lake Tahoe with  
2 you?

3 A. She was.

4 Q. Who was the second person you talked to  
5 about the Guidepost meeting?

6 A. Jim Law, my senior associate.

7 Q. And what was that conversation?

8 A. Basically, I told him what I had done  
9 and -- the 12 years previous, and that now Guidepost  
10 is going to make that known. And, see, when -- you  
11 need to understand that we used language that I  
12 didn't really quite understand, so when the report  
13 came out, I thought maybe I would be in a report and  
14 it would tell what I did 12 years ago. I didn't know  
15 that it was going to be a report that you didn't just  
16 have a consensual relationship. You assaulted a  
17 lady. So now it's a whole new ball of wax. So we  
18 didn't know that. And we didn't know what they were  
19 going to say in the Guidepost report, since we had  
20 never seen it and since nobody had ever really,  
21 really questioned me, really interviewed me: Not  
22 attacked, but interviewed; not accusations, but an  
23 interview.

24 Q. And what did Mr. Law say in response to  
25 what you shared with him?

1           A.     I love you more than I have ever loved you.  
2     And I will stand with you.

3           Q.     Did he suggest that you talk to anyone  
4     else?

5           A.     No, he made no suggestions.

6           Q.     And did you talk to anyone else?

7           A.     I'm sure I told my children when I got  
8     home.

9           Q.     And at what point following that May 12th  
10    interview did you decide to reach out to Dr. Ezell?

11          A.     When? On the way home, the flight home.

12          Q.     And how did you reach out to him?

13          A.     I text him. You-all have the text.

14          Q.     And based on that text, you arranged to  
15    meet him --

16          A.     The next day.

17          Q.     -- the following morning?

18          A.     Yes.

19          Q.     Where did that meeting take place?

20          A.     In the parking lot of Burger King.

21          Q.     And you were inside a vehicle?

22          A.     No. Parking lot, yes, in his vehicle.

23          Q.     Okay. And I think you have testified  
24    previously you told him the truth about the --

25          A.     Yes. There's nothing about assault because

1 there never was assault. But I told him about the  
2 consensual relationship. And then I said I'm  
3 tendering my resignation today.

4 Q. Did you ask or did you just say, I'm  
5 resigning?

6 A. I'm resigning. I'm a leader. I kind of  
7 know what a man ought to do.

8 Q. And why did you feel like you ought to do  
9 that?

10 A. I feel like I ought to go because I know  
11 that this report was so wicked and so twisted that  
12 when it came out, that would have put a lot of  
13 pressure on him.

14 Q. But you had not seen --

15 A. I had not seen --

16 Q. -- that version?

17 A. But to have heard how I was interrogated  
18 that day and accused, I could only imagine.

19 Q. And I asked earlier and I think you told me  
20 what you perceived in Dr. Ezell's actions. What did  
21 Dr. Ezell say to you in response to your tendered  
22 resignation?

23 A. Just basically: I hate this. I just hate  
24 it.

25 Q. Did he try to talk you out of resigning?

1 A. No. No.

2 Q. Did you also at some point call lawyers  
3 about the Guidepost meeting?

4 A. I had friends just coming and saying, What  
5 are you going to do? And I had never hired a lawyer  
6 before in my life, never been in a courtroom for  
7 anything before in my life. So basically I didn't  
8 know what to do. And I didn't know -- I didn't know  
9 one lawyer from another lawyer. I didn't know a  
10 difference in a trial lawyer or the ones everybody is  
11 advertised on a billboard. So somebody just said:  
12 Hey, I've got some attorneys. You just need to talk  
13 to them. And so I just reached out to tell them what  
14 I was dealing with.

15 Q. And did one of those attorneys send a  
16 letter to Guidepost and Ms. Kilpatrick?

17 A. Yes. Because they never gave me my rights  
18 before they spoke to me about I could have an  
19 attorney present. So I think -- I don't know law,  
20 but is it Upjohn, Upchurch? What is it.

21 MS. NOKES: We will mark this as  
22 Exhibit 11.

23 (Defendants' Exhibit 11, Letter to  
24 Kilpatrick from Lietz and Bouchard, 5/20/22,  
25 marked for identification.)

1 Q. (By Ms. Nokes) And ask you if you have seen  
2 that document before?

3 MR. KLEIN: Eleven, you said, Scarlett?

4 MS. NOKES: Yes.

5 A. Yes.

6 Q. (By Ms. Nokes) And have you had a chance to  
7 flip through it?

8 A. Through all of it, I think. Okay. I think  
9 it's just rules. Okay. Yes.

10 Q. Mr. Hunt, is it true that you believed  
11 Samantha Kilpatrick was acting as your attorney when  
12 she interviewed you as part of the Guidepost  
13 investigation?

14 A. Oh, absolutely not.

15 Q. You did not believe that?

16 A. No, I didn't believe that.

17 Q. Do you know why these lawyers would have  
18 put that in their letter?

19 A. They may have said that, thinking that I  
20 would get the same treatment that the [REDACTED] did. I  
21 think a lot of people in the Southern Baptist  
22 Convention, when this comes out, is going to think:  
23 Wait a minute, independent contractor, to find out if  
24 there is abuse, so if you met with them 11 times and  
25 probably 50 hours, not counting calls and texts and

1 emails, and you have met with this man for probably  
2 going to prove 15 minutes, I think it's going to be  
3 good public information.

4 Q. But you were never under the impression  
5 that anyone at Guidepost was acting in a capacity as  
6 your lawyer?

7 A. No, they couldn't have. They were the  
8 [REDACTED] attorney.

9 Q. Do you believe that, that they legally  
10 represented --

11 A. I believe -- I believe --

12 Q. Let me finish, just --

13 A. Okay.

14 Q. -- so we keep the record clean.

15 A. Okay. Sorry.

16 Q. Did you have any reason to think that  
17 investigators from Guidepost Solutions were legally  
18 representing Jane Doe and her husband?

19 A. Since I had never had an attorney before in  
20 my life, I felt that they were representing them  
21 because they brought everything -- there was nothing  
22 they talked to me about except for what they had  
23 learned from them. What else could I have believed?

24 Q. But you had lawyers send a letter saying  
25 that you thought Guidepost represented you?



1           A.     Well, I didn't have -- I just -- they asked  
2 me one question. So I knew nothing about what they  
3 wrote or were representing me. I don't understand  
4 law. They simply asked me: Did they say to you  
5 before they questioned you, We have an accusation we  
6 are bringing against you. You have a right to  
7 attorney-client privilege. They did not. That's all  
8 I knew. That's all that formed this. So as far as  
9 how they -- they viewed them, I didn't know. And I  
10 would have not known because I didn't understand law.  
11 I didn't know what had just happened, other than I  
12 had been accused.

13           Q.     And we talked a lot about the report.

14                   MS. NOKES: Rob, I did not print the entire  
15 report. I printed the cover page and the  
16 section that deals with Mr. Hunt. We have  
17 seen -- we have all seen it, multiple iterations  
18 of it. We will mark it --

19                   I don't think I put the sticker on it,  
20 Mr. Hunt.

21                   (Defendants' Exhibit 12, Guidepost Report  
22 of the Independent Investigation, 5/15/22,  
23 marked for identification.)

24                   MR. KLEIN: You have to make sure you give  
25 Rob one.

1 MS. NOKES: Yes, Defendants' Exhibit 12.

2 Q. (By Ms. Nokes) Mr. Hunt, have you seen this  
3 before?

4 A. Is this the regular report?

5 Q. It is.

6 A. Yes, ma'am, yes.

7 Q. It is an excerpt from the full report.

8 A. Yes, this --let's see. And so my  
9 understanding, this is the one who [REDACTED] wrote 50  
10 percent of, the 13 pages --

11 Q. This is the final Guidepost report.

12 A. -- according to depositions?

13 Q. I'm just asking if you have reviewed the  
14 final Guidepost report.

15 A. I have reviewed [REDACTED] and Guidepost's  
16 written report.

17 Q. The document you have in front of you?

18 A. Yes, ma'am.

19 Q. And I would ask you to turn to the page  
20 that is Number 158 and has page ID 191. It's a  
21 little confusing with multiple page numbers.

22 A. Okay. Page 158 and where?

23 Q. Just at the top, that first line says,  
24 During the first interview, Dr. Hunt did acknowledge  
25 during his publicly announced extended sabbatical he

1 was under the care of Mr. Blankenship. Is that  
2 accurate and correct?

3 A. That is after the incident.

4 Q. During your first interview with Guidepost,  
5 you acknowledged --

6 A. Oh, during the first interview? Oh, yes.  
7 That would have been -- correct.

8 Q. And the next line, when asked if the  
9 sabbatical, was it all related to a sexual abuse  
10 matter, he, meaning you, replied in the negative.

11 A. That question was never asked.

12 Q. Okay.

13 A. We never talked about me and sex abuse. Me  
14 and sex was never brought up in that first interview.

15 Q. And, again, this is the first Guidepost  
16 interview: Investigators asked Dr. Hunt several  
17 questions about pastor's church without identifying  
18 pastor. Is that accurate?

19 A. Present tense, they did. And so we were  
20 living in the 2022 world in that question. It's very  
21 important that I say that. They did not say: Did  
22 you know the pastor in 2010?

23 Q. Well, the next line is they asked if  
24 Dr. Hunt knew the circumstances of the resignation of  
25 the senior pastor at that church, who suddenly and

1 without explanation, resigned in 2010. Is that  
2 accurate?

3 A. I don't remember that question being asked.

4 Q. Do you recall responding that you stated  
5 you did not know who the pastor was or why he had  
6 resigned?

7 A. Absolutely not.

8 Q. So that's inaccurate?

9 A. Uh-huh.

10 Q. Is that inaccurate?

11 A. That is inaccurate.

12 Q. And then the next paragraph, we have gone  
13 to the second interview now. The first line of the  
14 second paragraph says, After interviewing several  
15 individuals with relevant information, Guidepost  
16 investigators set up a second interview with  
17 Dr. Hunt. Did I read that correctly?

18 A. Where are you? I'm sorry.

19 Q. The second paragraph on that same page we  
20 were on.

21 A. What page is that?

22 Q. 158.

23 A. Okay. One second. So put this in its  
24 context again, please.

25 Q. This is the final Guidepost report.

1 A. Uh-huh.

2 Q. The second paragraph moves into the second  
3 interview you had with Guidepost investigators. And  
4 my question is going to be about the second sentence  
5 in that second paragraph --

6 A. Okay.

7 Q. -- which says, Guidepost investigators  
8 explained to Dr. Hunt that they had received an  
9 allegation of abuse involving him and if he knew what  
10 they were talking about. Dr. Hunt responded that he  
11 was totally in the dark. Is that an accurate  
12 statement?

13 A. Let me see -- make sure I'm following you.  
14 Are you saying they said this before they met with me  
15 the second time or that's what they asked in the  
16 second time?

17 Q. In the second interview.

18 A. In the second. No, that would be true in  
19 the second interview, they would bring that up.

20 Q. And now going down to that third paragraph,  
21 In the second interview, Dr. Hunt acknowledged this  
22 time that he knew pastor, meaning Jane Doe's husband.

23 A. Being the first time they asked me if I  
24 knew him.

25 Q. And that's accurate?

1           A.     So, yes, we need to hold Guidepost  
2 responsible for saying that I lied in saying I didn't  
3 know him. Nowhere did I ever say I did not know  
4 █████ and █████ █████ never. But I was -- it's  
5 been told. So the blemish, the lie that they placed  
6 out there, placing me in bad light has done some of  
7 the worst damage to me.

8           Q.     And in the second interview, this second  
9 sentence of the third paragraph, Dr. Hunt stated that  
10 he had known the couple for at least 20 years.  
11 Pastor had been converted under his ministry and that  
12 you had been a strong influence on pastor's life. Is  
13 that all accurate?

14          A.     That's accurate.

15          Q.     You said for a time, you pastored churches  
16 in the same state. Is that accurate?

17          A.     That's accurate.

18          Q.     If you will flip over to the next page,  
19 page 159, which is page ID 192 in the record.  
20 Paragraph at the top, there's a sentence about  
21 halfway down that says, Dr. Hunt remembered Jane Doe  
22 texting him a picture of the pier, saying she was  
23 there. And you have testified about that today. Do  
24 you remember sharing that with the Guidepost  
25 investigators?

1 A. Yes. About the picture of the pier.

2 Uh-huh.

3 Q. Going to the next paragraph, when asked if  
4 you had any contact with Jane Doe while she was  
5 there, you responded that it was very brief on the  
6 balcony. Is that accurate?

7 A. May I ask a question?

8 Q. Only if it relates to --

9 A. It relates to this.

10 Q. Go ahead.

11 A. You skipped the first sentence, and I think  
12 it's very important because that's back to my  
13 narrative.

14 Q. First sentence --

15 A. Investigators at some point, pastor had  
16 contacted him about finding a place to rent for  
17 survivor. Absolutely not. He did not.

18 Q. And the next --

19 A. But that's the narrative they drew, that I  
20 did find that. So to skip that is to jump over the  
21 main point that I'm making of my case. So they have  
22 actually referred to it. Absolutely not, I didn't.  
23 So that's where it led to, no, that didn't happen,  
24 no, it didn't happen because it did not happen in the  
25 narrative they presented.

1 Q. Well, the very next sentence after the one  
2 you pointed out is that, Dr. Hunt did not remember  
3 pastor asking for information, nor did he recall  
4 providing a phone number to help find a place. Is  
5 that accurate?

6 A. It is accurate in the context that when  
7 somebody comes to you 12 years later and begins to  
8 ask questions that lawyers can't answer in two years,  
9 that I'm sitting here thinking, you know, did I? Or  
10 didn't I? Maybe the statute of limitations -- maybe  
11 there's a real reason for that because people can't  
12 remember. But then when you sit back and you begin  
13 to question and doubt yourself, like: Did I? And  
14 then you get a clear mind on it and say, Absolutely  
15 not. He didn't call me about a place. But he called  
16 me about a job.

17 Q. Do you recall giving him a phone number to  
18 help him find a place?

19 A. Absolutely not.

20 Q. Okay. So you told Guidepost you did not  
21 recall providing a phone number?

22 A. Yes. I did not have a number, and I -- to  
23 this day, I don't have a number of who lived next  
24 door to me. And that was his testimony: I gave him  
25 a number and it was the number to the person that



1 lived next door that I have never met in my life, and  
2 now, to this day, I don't know who they are -- so  
3 fabricated.

4 Q. So we talked about the picture of the pier.  
5 The next sentence is, When asked if he knew where she  
6 was, Dr. Hunt said, Unbeknownst to him, Jane Doe had  
7 rented the condo next door, but he had no role in  
8 that. Is that accurate?

9 A. Accurate.

10 Q. You stated that you had no idea who owned  
11 the condo next door because the building is mostly  
12 rentals?

13 A. Correct.

14 Q. That's accurate?

15 A. Yes, ma'am.

16 Q. Going to the next paragraph, when asked if  
17 you had any contact with Jane Doe while she was  
18 there, you responded that it was very brief on the  
19 balcony. Is that accurate?

20 A. In the context of being very unsure of what  
21 I wanted to say to someone that had made so many  
22 accusations, yes.

23 Q. The next sentence, While on the balcony,  
24 you remember Jane Doe telling you about going to see  
25 Bobby Bowden speak that morning but do not remember

1 her saying what else she did that day before getting  
2 to the beach. Is that accurate?

3 A. That's correct.

4 Q. Then the next sentence is in parentheses  
5 but says both you and Jane Doe described the  
6 balconies as side by side, but you could not walk  
7 through to the other. Is that accurate?

8 A. That is.

9 Q. Next sentence, Dr. Hunt was asked whether  
10 he went onto her balcony or entered her condo and he  
11 responded he had never entered her condo and was  
12 never on her balcony. Is that accurate?

13 A. That's what I said in our interview with  
14 them.

15 Q. In the next sentence, you said that, After  
16 seeing Jane Doe on the balcony, you did not have any  
17 further contact with her during the time she was  
18 there. Is that accurate?

19 A. In light of the first sentence on the top  
20 of the page, that's why I would not say anything to  
21 them other than no, no, no.

22 Q. And the next sentence, However, later in  
23 the interview, you stated that you saw her the next  
24 day on the beach and then the following day, your  
25 wife said something to her. Is that accurate?

1           A.     And she was unaware of anything happening.  
2     But she was aware that there was a person preying on  
3     her husband.

4           Q.     Is that sentence in the report accurate?

5           A.     Yes, ma'am.

6           Q.     And the last sentence in that paragraph and  
7     you didn't know whether Jane Doe changed her plans or  
8     just went home.   Is that accurate?

9           A.     No, that's not accurate.

10          Q.     You said that in that interview?

11          A.     No, I did not say that.

12          Q.     And then on to the next paragraph, you said  
13     that you did not have any contact with Jane Doe, in  
14     quotes, "no contact whatsoever."   Is that accurate?

15          A.     That's accurate.

16          Q.     You also stated it was not true you were on  
17     the balcony or in the condo.   Is that accurate?

18          A.     That's accurate.

19          Q.     When asked specifically about whether you  
20     kissed Jane Doe, pulled at her shorts or fondled her,  
21     you said no.   Is that accurate?

22          A.     In the context of the -- and these weren't  
23     questions that are being asked like you are reading  
24     to me now.   We are having a very sensible  
25     conversation.   This was not a sensible conversation.

1 This was an attack. This was blindsided. This was:  
2 We have already got our report. We are getting ready  
3 to bill \$2 million. You are all we got, and they  
4 dove in on me. And that's what happened. And so I'm  
5 denying it in the context of their claim.

6 Q. So the sentence, as drafted, is accurate?

7 A. The sentence is correct.

8 Q. And then the final sentence in that  
9 paragraph, you denied sexualized comments about Jane  
10 Doe's appearance, panties, tan lines or perfume. Is  
11 that accurate?

12 A. When she was standing on the balcony, I  
13 could smell her perfume, and I said, That perfume  
14 smells nice. The other, I never said any of that.

15 Q. The next paragraph, bottom of Page 159, you  
16 shared that your wife was uncomfortable with Jane Doe  
17 next door by herself because it just did not look  
18 right she was down there all alone. Is that  
19 accurate?

20 A. In the context that she seen her on the  
21 beach half naked in front of me, and thinking: What  
22 is she doing down here? She was just here two weeks  
23 ago with her husband. What's she doing back without  
24 her husband? Although I'm told that others maybe  
25 were supposed to meet her. I'm sure you-all have

1 investigated that. But that statement has to be in  
2 the context of my wife didn't feel right about it  
3 with her laying there in front of us. She seemed to  
4 be -- women seem to have an awareness if someone is  
5 attracted to their husband. So in that context. So  
6 to not put it in this context is to tell a lie.

7 Q. The next sentence, which will take us over  
8 to page 160, At some point, you think your wife might  
9 have said something to Jane Doe and that all you knew  
10 was that Jane Doe was not there anymore. Is that  
11 accurate?

12 A. Until I saw my wife and she told me she had  
13 told her to leave.

14 Q. So at the time, you didn't --

15 A. At that moment, yes, I didn't know.

16 Q. And that's what you conveyed to the  
17 Guidepost investigators?

18 A. Yes.

19 Q. The next sentence, When asked whether your  
20 wife was there the whole time with you, you stated  
21 there may have been a brief time she was not there  
22 because of an event at Southeastern Baptist  
23 Theological Seminary where she may have flown in and  
24 out in one day or the next day. Is that accurate?

25 A. That's accurate.

1 Q. You said, It was possible that she was not  
2 there some of the time that Jane Doe was there. Is  
3 that accurate?

4 A. That's accurate.

5 Q. When you asked if you contacted  
6 Mr. Blankenship, the counselor, because there was a  
7 problem between Jane Doe's husband and Jane Doe, you  
8 said that you did not contact him in regard to that  
9 but just for general help because Jane Doe's husband  
10 was transitioning in ministry and you had always been  
11 a sounding board for him. Is that accurate?

12 A. That's accurate.

13 Q. Next paragraph, You remembered only one  
14 meeting with the couple, meaning Jane Doe and her  
15 husband, on August 2nd, 2010. Is that accurate?

16 A. One meeting in what -- what reference? I  
17 don't quite follow you.

18 Q. I believe that's referencing  
19 Mr. Blankenship in a joint meeting.

20 A. But what do you mean by "only one meeting"?

21 Q. I'm reading the report and asking if that's  
22 accurate based on your recollection of what you said  
23 to Guidepost?

24 A. Well, I feel like to say it was only one  
25 meeting means I never met with them again.

1 Q. With Mr. Blankenship?

2 A. With Mr. Blankenship. That would -- see,  
3 that's not in there. I'm sorry, but.

4 Q. Yes. It's just continuing from the  
5 previous paragraph.

6 A. Okay.

7 Q. But we can clarify that you only remember  
8 meeting one time --

9 A. Meeting with them -- with --

10 Q. -- with the couple and Mr. Blankenship?

11 A. That's correct.

12 Q. You said that the meeting was brief and  
13 that you, your wife, along with Jane Doe and her  
14 husband, Mr. Blankenship were present. Is that  
15 accurate?

16 A. That's correct.

17 Q. And you claimed you never directed the  
18 couple -- meaning Jane Doe and her husband -- towards  
19 Mr. Blankenship for counseling?

20 A. Strictly their decision.

21 Q. So that's an accurate sentence?

22 A. That's an accurate sentence.

23 Q. The next paragraph, You said that you did  
24 not apologize to Jane Doe for sexually assaulting her  
25 during this meeting because there was no contact

1 between the two of you. Is that accurate?

2 A. I had already apologized to her before that  
3 meeting in her husband's office with her present.

4 Q. Without Mr. Blankenship?

5 A. No, Mr. Blankenship was with me.

6 Q. Okay.

7 A. He went with me to their office. I went to  
8 [REDACTED] office at his church, lined the meeting up  
9 and met and asked Roy to go with me. And then -- and  
10 told him to bring his wife.

11 MR. MacGILL: And your question is, Was  
12 there an apology?

13 MS. NOKES: Yes. Is the sentence in the  
14 report accurate based on what you told  
15 Guidepost?

16 MR. MacGILL: Well, read the whole sentence  
17 because you -- it's a loaded sentence, Counsel,  
18 as you know. There's a reference to sexual  
19 assault here.

20 Q. (By Ms. Nokes) Dr. Hunt said that he did  
21 not apologize to survivor for sexually assaulting her  
22 during this meeting. This is, again, referencing the  
23 August 2nd meeting with Roy Blankenship because there  
24 was no contact between the two of them. Is that an  
25 accurate sentence?



1 A. There was no contact. The sentence is very  
2 confusing. I'm not sure I --

3 Q. Well, let me set the table here.

4 A. Okay.

5 Q. This is, again, based on -- it's the final  
6 Guidepost report, and here they are reporting your  
7 interview, your second meeting, your interview with  
8 them and how they summarized it for the report. So  
9 is that summary of what you said about that aspect of  
10 the August 2nd meeting with Roy Blankenship --

11 A. So this is the May 12th meeting?

12 Q. This is based on the interview on May 12th  
13 that you had with Guidepost investigators and what  
14 ended up in the report.

15 A. Yes. There were -- that would be -- I  
16 don't remember saying that, but that's a true  
17 statement because I didn't need to apologize for  
18 sexually assaulting somebody I never sexually  
19 assaulted.

20 Q. Okay. You denied saying, in quotes,  
21 "Praise Jesus that I didn't consummate the  
22 relationship." Is that accurate?

23 A. No. I didn't say that. That would be so  
24 out of character.

25 Q. So the denial, then, would be accurate. It

1 gets confusing.

2 A. The denial of which one, the first one you  
3 asked or the one you just asked?

4 Q. You denied that you said, "Praise Jesus" --

5 A. Oh, I deny that. I deny that.

6 Q. So that's accurate?

7 A. He denied saying, I praise Jesus that I  
8 didn't consummate the relationship. Are they saying  
9 I said this to them? It's hard to follow for me.

10 Q. I think they asked did you say that?

11 A. Oh, did I say that? Oh, yeah. Okay.

12 Q. You said, No, I did not say that.

13 A. I thought they were saying, I praise Jesus  
14 I didn't consummate.

15 MR. MacGILL: So I don't understand the  
16 question. You are saying the question premise  
17 is, Guidepost said, Did you say, quote, "Praise  
18 Jesus that I didn't consummate the relationship"  
19 unquote.

20 And you are asking him if he denied that  
21 statement or question by Guidepost?

22 MS. NOKES: Yes. If that's an accurate  
23 summary of what he said in the interview.

24 THE WITNESS: When would I have said that?

25 MS. NOKES: Well, they -- you want to say

1 something?

2 THE WITNESS: Yeah, go ahead.

3 MR. BESEN: Let me just try. Guidepost  
4 accurately reported in the second sentence of  
5 the fourth paragraph on page 160 that you denied  
6 saying, Praise Jesus that I didn't consummate  
7 the relationship.

8 MR. MacGILL: And you are saying, Gene,  
9 that Guidepost said -- made the question --

10 MR. BESEN: No, I'm saying, Guidepost  
11 accurately reported what your client testified  
12 to, that he did not say that.

13 MR. MacGILL: But somebody had to raise it.  
14 Who made the quotation?

15 MR. BESEN: It's irrelevant. The only  
16 question is, Is the report accurate?

17 A. I don't beyond the context. When was this?  
18 I mean, are they saying I said that --

19 Q. (By Ms. Nokes) All of this relates to your  
20 interviews with Guidepost and how they summarized  
21 those interviews in their final report, which is what  
22 we all have in our hand.

23 A. So in the second meeting that I was with  
24 them --

25 Q. Yes.

1 A. -- they asked me, Did you say, Praise  
2 Jesus?

3 Q. And you said --

4 A. When would I have said it? I'm trying to  
5 think of like when. I mean, there must be a  
6 contextualized. Where did it come from? Like from  
7 when? When would there be an opportunity to say,  
8 Praise Jesus? Like when I was with her that day? Is  
9 that what you're saying? You're shaking heads. So I  
10 said, Praise Jesus I didn't consummate it, what, as I  
11 was leaving the room or when? I have no context of  
12 this statement.

13 Q. I'm only asking --

14 A. I can't answer what I don't understand.

15 Q. That's perfectly reasonable.

16 A. Okay.

17 Q. We will move on.

18 The next sentence is, If there was an  
19 apology, you believed it was related to Mrs. Hunt  
20 offending Jane Doe about being concerned with her  
21 being there alone and then apologizing for her having  
22 to leave. Is that accurate?

23 A. I don't remember that.

24 Q. And the next sentence, you stated, again,  
25 in quotes, "Someone has created a story on me. I

1 would like to hear her story on this." Is that  
2 accurate?

3 A. I don't remember saying it, but I would say  
4 it today.

5 Q. So you are not offended by it?

6 A. Oh, no, I'm not offended. Somebody did  
7 create a story on me and I'd like to hear -- I can  
8 hardly wait for her to be deposed and hear her story.  
9 And I can hardly wait to face her in court.

10 Q. And the next sentence is, Dr. Hunt said  
11 that Jane Doe had never come on to him and that he  
12 never felt threatened by her. Is that accurate?

13 A. That would be a true statement.

14 Q. You said that you and Jane Doe's husband  
15 have stayed in contact over the years. Is that  
16 accurate?

17 A. Yes. And he initiated 95 percent of it.

18 Q. Next sentence, Investigators asked you if  
19 there were any similar allegations with other women.  
20 You answered no. Are those accurate?

21 A. That's very accurate.

22 Q. Going to the next paragraph, Several times  
23 during the interview, Guidepost investigators  
24 directly asked you about specific allegations of  
25 sexual abuse against Jane Doe, controlling the

1 narrative through the use of an unlicensed therapist  
2 and trying to protect his ministry, 40,000 churches  
3 and the SBC, all of which you denied. Is that an  
4 accurate sentence?

5 A. Where are you? I'm sorry.

6 Q. Bottom of page 160, that last paragraph.

7 A. That would be accurate in the sense that,  
8 again, they are drawing a narrative that's not true,  
9 that I'm controlling a narrative -- there it is  
10 again, there's the narrative -- that I'm controlling.  
11 I have no control. And even the unlicensed  
12 therapist, he owns degrees from our seminary, so when  
13 our Southern Baptist Convention understand that, he  
14 would be far more trained than a person that goes and  
15 gets a license as opposed to one that would spend  
16 four years getting a seminary degree. It makes it  
17 sound like he was unqualified. He was very  
18 qualified.

19 Q. And worked through Woodstock and its  
20 ministries, correct?

21 A. At this particular time, he had his own  
22 ministry. He was not working for me.

23 Q. Is that sentence accurate, the last one I  
24 read at the bottom of 160?

25 A. No, it's not right.

1 Q. The next --

2 A. You mean the trying to protect this  
3 ministry?

4 Q. Yes.

5 A. No, that's not correct. That's their --  
6 that would be their statement. Yes, correct, he's  
7 saying: That's their statement, not mine. So for me  
8 to say it's correct, no, it's a lie.

9 Q. The investigator -- this is the bottom of  
10 page 160, going over to page 161. The investigators  
11 asked you if there was anyone else you thought they  
12 should speak with about the matter, and you said the  
13 only ones who would know would be the couple, meaning  
14 Jane Doe and her husband and Mr. Blankenship. Is  
15 that accurate?

16 A. That's accurate.

17 Q. The investigators asked if you thought your  
18 wife would speak with them. And you replied no,  
19 saying that you doubted she would speak to them  
20 because her take was that you and she had handled it  
21 and moved on. Is that accurate?

22 A. Exactly the truth.

23 Q. Investigators understood this to mean that  
24 Dr. Hunt had apologized for the fact that his wife  
25 had upset Jane Doe by telling her to leave. Is that

1 accurate?

2 A. I believe that would be their statement of  
3 what they thought, not what I thought.

4 Q. And the final sentence of that paragraph,  
5 Throughout the interview, Dr. Hunt remained very  
6 calm, expressed little to no emotion, did not get  
7 upset, did not raise his voice or express outrage at  
8 the allegations?

9 A. Not true.

10 Q. The last paragraph is just two sentences.  
11 It says, We included the sexual assault allegation in  
12 the report because the investigators found pastor and  
13 survivor to be credible and the report was  
14 corroborated in part by Mr. Blankenship and three  
15 other credible witness. And Dr. Hunt, while denying  
16 physical contact, does acknowledge that he had  
17 interactions with Jane Doe, including on the condo  
18 balcony during the relevant time period. The  
19 investigators did not find Dr. Hunt to be credible in  
20 their interviews with him.

21 Two questions about this, first, is it  
22 accurate?

23 MR. MacGILL: Is what accurate?

24 MS. NOKES: The --

25 A. Entire paragraph?



1 Q. (By Ms. Nokes) Yes.

2 A. It's not accurate.

3 Q. And, again, would you say that's  
4 Guidepost's conclusion?

5 A. That's Guidepost's conclusion. After  
6 meeting 11 times with them and 15 minutes with me,  
7 they have made a rational decision.

8 Q. And the second question is, Do you think it  
9 was fair for them to find you to not be credible  
10 based on the answers you gave in your interview?

11 A. Well, since I --

12 MR. MacGILL: Whoa, whoa, whoa, whoa.  
13 Answers you gave when, in the --

14 MS. NOKES: In the --

15 MR. MacGILL: There's only been one  
16 interview and that was in April, right? Is that  
17 what you are talking about?

18 MS. NOKES: I think the credibility  
19 assessment is a total assessment.

20 Q. (By Ms. Nokes) So I will rephrase the  
21 question. The final sentence says, The investigators  
22 did not find Dr. Hunt to be credible in their  
23 interviews with him.

24 And I'm just asking if you think that was a  
25 fair assessment from your perspective?

1           A.     It was a very unfair assessment because  
2 they really had not assessed me. They had assessed  
3 the couple that they were representing. They  
4 represented the ██████████ in this case. There may be  
5 another lawyer out there. They represented them.

6           Q.     So the report comes out, right, that's what  
7 we --

8           A.     Yes, ma'am.

9           Q.     -- we just looked at?

10                   Do you recall issuing a public statement by  
11 way of a tweet about the report on May 22nd?

12           A.     You mean the letter?

13           Q.     Not the letter. Did you issue any  
14 statements that preceded the letter?

15           A.     I don't remember.

16                   (Defendants' Exhibit 13, Article from The  
17 Baptist Paper entitled, Hunt Denies Allegations  
18 of Abuse, marked for identification.)

19           Q.     (By Ms. Nokes) I'm going to mark as  
20 Exhibit 13, this is a -- that's the date it was  
21 printed. It's a article from the Baptist paper. I'm  
22 not really interested in anything other than the last  
23 page. But you are welcome to look at all of it.

24           A.     Okay. Any particular portion?

25           Q.     Yes. The -- on the bottom of Page 3,

1 there's a section in bold labeled "Hunt's Response."

2 A. Okay.

3 Q. And it says that your May 22nd statement  
4 reads, quote, "During my 50 years of ministry, I have  
5 always had a singular goal, to share the good news of  
6 Jesus Christ with a broken world. It has been the  
7 joy of my life to minister alongside so many selfless  
8 men and women at the North American Mission Board to  
9 spread the hope, love and grace of the Lord Jesus  
10 Christ. While I have resigned from my position at  
11 NAMB, I will continue to dedicate my life to  
12 encouraging and instructing pastors. Of course, I'm  
13 aware that Guidepost Solutions issued a report  
14 earlier today, May 22nd. I did not see a copy of the  
15 report before today, and I have not had an  
16 opportunity to read the entire report," he said. "I  
17 want to be clear, my heart breaks for all victims of  
18 abuse. I support the rights of abuse victims to be  
19 heard and respected and made whole. I also support  
20 transparency and accountability for abusers. But  
21 transparency and accountability must be founded on  
22 truth and accuracy," Hunt stated. "To put it  
23 bluntly, I vigorously deny the circumstances and  
24 characterization set forth in the Guidepost report.  
25 I have never abused anybody. Southern Baptist,

1 navigating this challenging season, must remember:

2 Quote, It is the truth that will set us free."

3 Is that an accurate recitation of a

4 statement you made after the report?

5 A. I made it after the report and believed it

6 and believe it as much or more today.

7 Q. But is it still available -- how did you

8 put the statement out?

9 A. I don't know that I put that statement

10 out -- or did I? It looks like the Baptist paper --

11 Q. Is it possible it was in a tweet?

12 A. I don't think so.

13 Q. Okay.

14 A. No, I gave up my Twitter account right at

15 this time.

16 Q. Are those your words?

17 A. But those would have been my words, yes,

18 ma'am.

19 Q. And did NAMB also issue a statement on

20 May 22nd?

21 A. They issued one sometime. I'm not sure the

22 date.

23 MS. NOKES: And we will mark this one as

24 Defendants' Exhibit 14.

25 (Defendants' Exhibit 14, NAMB Statement,

1 5/22/22, marked for identification.)

2 Q. (By Ms. Nokes) And this says, NAMB's  
3 statement following the May 22nd, 2022 release of the  
4 SBC's Sexual Abuse Task Force Report. The North  
5 American Mission Board, NAMB, issued the following  
6 statement from president and CEO, Kevin Ezell: "The  
7 work of the task force is important for our  
8 convention and for the healing of survivors. The  
9 details in the report, which we are just now  
10 beginning to process, are egregious and deeply  
11 disturbing. We honor the courage of the survivors  
12 who came forward. We are praying for survivors and  
13 their families, for our churches, for wisdom, for  
14 discernment and for the humility to use this report  
15 for God's glory. On Friday, May 13th, prior to my  
16 knowledge of the report's detailed allegations,  
17 Johnny Hunt resigned from NAMB as senior vice  
18 president of evangelism and leadership. His  
19 resignation was effective immediately. Out of  
20 respect for the investigation of the SBC Executive  
21 Committee, we chose not to speak publicly about this  
22 resignation until after the task force report was  
23 released. Prior to May 13th, I was not aware of any  
24 alleged misconduct on the part of Johnny Hunt. I  
25 learned the details of the report today, along with

1 the rest of our Southern Baptist family."

2 First of all, did I accurately read this  
3 exhibit?

4 A. Yes, ma'am.

5 Q. And had you seen this statement before  
6 today?

7 A. I had seen that.

8 Q. Anything you disagree with in what  
9 Dr. Ezell said on May 22nd?

10 A. I don't know that he said anything. Let's  
11 see. Prior to my knowledge of the report...was  
12 choosing not to speak. I'm not aware of any  
13 alleged... Basically, he learned the details the same  
14 time I did because I was falsely accused of doing  
15 something I never did. Basically one subject:  
16 Sexual abuse.

17 (Defendants' Exhibit 15, Letter to Dear SBC  
18 Family from Thomas and Ezell, 5/25/22, marked  
19 for identification.)

20 Q. (By Ms. Nokes) What I have marked as  
21 Exhibit 16 is a second NAMB statement in more of a  
22 letter form, dated May 25th, 2022. Mr. Hunt, have  
23 you seen this before?

24 A. I'm not sure I have.

25 Q. The first paragraph states, "We are deeply

1   grieved at the findings of the independent  
2   investigation of the SBC Executive Committee  
3   commissioned by Guidepost Solutions and especially at  
4   the credible allegation of abuse involving one of our  
5   former employees. We must knowledge with grief that  
6   we believe the report is well-documented and verified  
7   with a high level of professionalism and due process.  
8   We are heart broken, especially for the survivor, her  
9   husband and the others mentioned in the report. We  
10   are deeply grateful for their courage and sacrifice  
11   in speaking up."

12                   Did I read that accurately?

13           A.    You did.

14           Q.    And do you agree or disagree with the way  
15   NAMB expressed their opinions of the report and its  
16   findings?

17           A.    I don't believe I can answer it with agree  
18   or disagree. I would answer it in that they did what  
19   every other Southern Baptist did when they saw this  
20   falsified report. And then so much being said about  
21   independent investigators, credible allegations, such  
22   as three people that could only speak of what they  
23   heard her husband say, how under God's heaven, not an  
24   attorney in this room believes that those guys could  
25   be credible witnesses when they heard from someone

1 else. So the way it's set up, it looks like there's  
2 five people out there proving that Johnny Hunt is a  
3 liar and he abused a lady. That deeply grieves me.  
4 And I look forward to being able to say that in front  
5 of a jury.

6 Q. And following up on NAMB, Jeremy Morton  
7 succeeded you at First Baptist Woodstock?

8 A. He did, yes.

9 Q. And you had a close personal friendship  
10 with Jeremy?

11 A. I did.

12 Q. And how did your former church respond to  
13 the Guidepost report?

14 A. Mixed. Mixed.

15 Q. What about the leadership of First Baptist  
16 Woodstock?

17 A. Mixed.

18 Q. What about how Pastor Jeremy handled it  
19 from the pulpit of the church?

20 A. Awful.

21 Q. And why do you say it was awful?

22 A. Because he believed every word in the  
23 report, and the report had not been verified by  
24 anyone.

25 Q. And how did he convey that to the



1 congregation?

2 A. Basically, took it more along the lines, We  
3 are going to do everything we can to make sure that  
4 we have preventative measures in place for sexual  
5 abuse, when, in the 33 years I was there, I never had  
6 to deal with a sexual abuse case.

7 Q. Not one?

8 A. That I dealt with I mean, there may have  
9 been others. And it was not to say they were not  
10 consensual relationships, but I never dealt with an  
11 abuse relationship.

12 (Defendants' Exhibit 16, Letter to Dear  
13 First Baptist Woodstock from Johnny Hunt,  
14 5/27/22, marked for identification.)

15 Q. (By Ms. Nokes) I think this is the letter  
16 you referenced a minute ago, marked as Defendants'  
17 Exhibit 16. Is this document familiar to you?

18 A. Yes, ma'am.

19 Q. And is this a letter that you wrote and  
20 released on May 27th, 2022?

21 A. Yes, ma'am.

22 Q. And in it, in the second paragraph, you  
23 say, I made a brief public comment then, but I would  
24 like to say more now. Is that brief public comment  
25 referencing the other document we looked at, other

1 statement?

2 A. Correct.

3 Q. And then it goes on to say, 12 years ago,  
4 right after my service as SBC president and in the  
5 aftermath of my battle with cancer, I entered into a  
6 season of deep despair and probably clinical  
7 depression. I remember Janet asking me then how I  
8 felt, and I said to her, I feel like something inside  
9 of me has died.

10 Did I read that correctly?

11 A. You did.

12 Q. And does that accurately convey your  
13 sentiment?

14 A. Exactly.

15 Q. Then it goes on to say, It was during that  
16 summer that I allowed myself to get too close to a  
17 compromising situation with a woman who was not my  
18 wife. It happened when she invited me into her  
19 vacation condo for a conversation. Against my better  
20 judgment, I chose to go.

21 A. Uh-huh.

22 Q. And is that -- did I accurately read it?

23 A. Yes, ma'am.

24 Q. And is it an accurate statement?

25 A. It is.

1 Q. Our brief, but improper encounter ended,  
2 when, in response to the overwhelming feeling of  
3 conviction, I stopped it and I fled the situation. I  
4 remember saying just before leaving the condo, This  
5 is not right. I have no business being here. I love  
6 my wife. I have never been in a room again privately  
7 with the woman involved.

8 Is that accurate?

9 A. Yes, it is.

10 Q. I thank God we did not go further than we  
11 did. But that is also no excuse for my grievous sin.  
12 I will regret that day for the rest of my life, and I  
13 take responsibility for the situation because I chose  
14 to enter her condo.

15 Is that accurate?

16 A. That's correct.

17 Q. I am sorry. It was an awful sin, but it  
18 was a consensual encounter. It was not abuse, nor  
19 was it assault.

20 Is that all correct?

21 A. It is positively, absolutely 100 percent  
22 the truth.

23 Q. And you go on to say, Almost immediately  
24 after the incident in 2010, I began a process of  
25 taking personal responsibility for my personal sin.

1 A. Correct.

2 Q. Within the same week, to my shame, I  
3 confessed the situation in detail to my wife.

4 Is that correct?

5 A. Correct.

6 Q. And putting aside the exhibit, are those  
7 details the same details you shared in your  
8 deposition today?

9 A. I think they are.

10 Q. Is there anything different about what you  
11 shared with Janet than the details from today?

12 A. No, ma'am.

13 Q. Janet is a truly Godly woman and was far  
14 more gracious than I deserved. I also spoke to the  
15 husband of the woman involved about one week later,  
16 and I spoke to the husband together with his wife  
17 present. I apologized to both and sought their  
18 forgiveness. I also sought professional help from a  
19 counselor in order to better understand how this had  
20 happened and to seek advice on an appropriate process  
21 of repentance, reconciliation and restoration. I was  
22 willing to resign my ministry then, forever; however,  
23 after completing that private process, which involved  
24 seeking the forgiveness of God and those involved and  
25 recovering from that dark, depressing season, I felt

1 I could return to Woodstock in the fall of 2010.

2 Is that accurate?

3 A. That's correct.

4 Q. That is what happened. I want you to know  
5 that this is the truth. It is also the whole truth.

6 Is that accurate?

7 A. That's true.

8 Q. Church, I want to be direct. I am not  
9 seeking your sympathy. I am not a victim. I have to  
10 bear the responsibility for my sin, which has  
11 basically cost me everything except my faith and my  
12 family over the last seven days.

13 Is that accurate?

14 A. That's accurate.

15 Q. I'm also not asking you to feel sorry for  
16 me. This is my burden to bear. I am asking you to  
17 please pray for us.

18 Is that accurate?

19 A. That's accurate.

20 Q. I do want you to know -- and you have known  
21 me for over 40 years -- that as awful as my sin was  
22 on that terrible day, the account described in the  
23 Guidepost report is sensationalized. I did not groom  
24 the woman involved, nor did I intentionally arrange  
25 the encounter. I didn't even know who owned the

1    condo.    And there are other details in the  
2    description that are stated as fact which did not  
3    happen.

4                    Is that accurate?

5            A.    It is.

6            Q.    The most absurd allegation is that this  
7    brief consensual encounter constituted assault.    It  
8    did not.    This is the reason why I denied the  
9    accuracy of the report and why I deny it now.

10                   Is that accurate?

11           A.    It is.

12           Q.    As I said in my statement on Sunday, I have  
13   never abused anybody.    With God as my witness, while  
14   the situation described in the Guidepost report is  
15   based in reality, the allegation made in the report  
16   is false.    I also am sorry I wasn't more forthcoming  
17   with the interviewers because it has made a bad  
18   situation worse.    I guess I was just so surprised and  
19   so shocked by the allegations of abuse that I shut  
20   down.

21           A.    That's exactly what I just told you.

22           Q.    You may be wondering why I did not make my  
23   confession to the church at the time of my sin.    I  
24   justified not doing so on the basis of a biblical  
25   principle that sin is first and foremost against God.

1 King David wrote in Psalm 51:4, Against you and you  
2 only have sinned and done this evil in your sight.

3 Is that accurate?

4 A. It's accurate.

5 Q. I have also always taught that confession  
6 should be as broad as the offense. Since I had  
7 sought forgiveness from those I had offended and put  
8 myself under the care of others during the process, I  
9 thought I had done my part.

10 Is that accurate?

11 A. Yes.

12 Q. So now I ask all of you also to please  
13 forgive me. As I did 12 years ago and again today, I  
14 confess that I sinned. I crossed a line. I repent  
15 in brokenness and shame. I turn from my sin again.  
16 Back then, I confessed and sought forgiveness from  
17 all persons I sinned against. I would ask the same  
18 of all that learned of my confession now: Please  
19 forgive me.

20 Is that accurate?

21 A. Correct.

22 Q. So I want to pause there. We will read the  
23 rest of it. But you have said a few times today that  
24 you wouldn't change anything about the way you  
25 handled it?

1 A. Correct.

2 Q. So why did you need forgiveness from  
3 your -- this was addressed to your church -- why did  
4 you need forgiveness at this point from the church?

5 A. Because the false allegations made it known  
6 to people of a private matter, private nature that  
7 had been dealt with to those I had sinned against,  
8 but when they couldn't find anything else to report  
9 and they brought this report to the world, to the  
10 world, it's not just hurting me publicly there, but  
11 everywhere. So it makes it look like something is  
12 covered up. But I had uncovered this to the people  
13 that had been offended by it. So certainly if  
14 someone would say, I just heard of what happened, I  
15 would say, Forgive me. I'm sorry. So it weren't --  
16 they weren't part of the ones that were abused in  
17 this situation. So.

18 Q. Do you feel like you needed their  
19 forgiveness?

20 A. I think it's the proper thing to do.

21 Q. Not necessary, but proper?

22 A. I think it's absolutely proper thing to do,  
23 but not necessarily a must because they have no law.  
24 I didn't sin against them. I sinned against God.  
25 All sin is against God.



1 Q. Getting back to the statement, I took then  
2 and I take now responsibility for my actions. I'm  
3 also submitting myself to the care of a small group  
4 of wise, Godly leaders to enter into a season of  
5 intentional restoration, given the public nature of  
6 the events of recent days.

7 Is that accurate?

8 A. Yes.

9 Q. And, finally, for all of those whose  
10 ministries I have influenced over many years, my  
11 prayer is that this season, the most difficult of my  
12 50-year ministry is a reminder to every one of you  
13 that no spiritual leader is beyond temptation.

14 Is that accurate?

15 A. That's correct.

16 Q. I thank God for His grace and I'm sorry for  
17 any disappointment this news will cause to anyone. I  
18 leave you with a few words from the book of First  
19 Timothy, which seem appropriate. This is a faithful  
20 saying and worthy of all acceptance, that Christ  
21 Jesus came into the world to save sinners, of whom I  
22 am chief. First Timothy 1:15. Blessings, Johnny  
23 Hunt.

24 Accurate?

25 A. Yes, ma'am.

1 Q. Anything you would change about that letter  
2 in light of the time that has passed since you issued  
3 it?

4 A. No, I still believe every word the way I  
5 put it in there because the major thing that I would  
6 put emphasis on, I never abused anybody. Never.  
7 Never have in my entire life. Didn't then, didn't  
8 now. And this -- the reason we are around this table  
9 today is not how much money I make. It's not who  
10 owns what company in my family. It's about one  
11 thing: Did Johnny Hunt abuse [REDACTED] [REDACTED] or did she  
12 wait 12 years and for reasons that will be made  
13 public, they chose to go the route of making up this  
14 story to fit. And that's a reason I guess I'm just  
15 finding out with you-all or with my attorney that no  
16 wonder it took 16 different drafts of my story  
17 because it kept changing in order to accommodate me  
18 fitting into the report when I never fit into it to  
19 begin with.

20 Q. Has Jane Doe or her husband filed any  
21 lawsuit, to your knowledge?

22 A. None that I know of. And I think there  
23 was -- I had at least heard, maybe through the  
24 grapevine, that they attempted to but it had passed  
25 the law of limitation and statute of limitation in

1 the State of Florida, being 12 years.

2 Q. And is Jane Doe seeking any monetary  
3 compensation?

4 MR. MacGILL: Against the SBC?

5 Q. (By Ms. Nokes) Against anyone involved?

6 A. That's probably attorney eyes only, but I  
7 haven't --

8 MR. MacGILL: Yes. I don't think that he  
9 can an- -- he's not been given access to the  
10 more than 11,000 pages of documents, therefore,  
11 he doesn't have a basis --

12 MS. NOKES: I'm just asking if he has any  
13 knowledge.

14 THE WITNESS: I don't have.

15 MR. MacGILL: Just for the record, the  
16 Guidepost, perhaps acting in concert with the  
17 SBC and the SBC executive committee, have  
18 embargoed for you -- from you more than 11,000  
19 pages of records in this case. Are you aware of  
20 that? Do you have that knowledge that they've  
21 embargoed 11,000 pages from you?

22 THE WITNESS: Yes, I'm aware of that.

23 MR. MacGILL: And you are answering  
24 Scarlett's question on the basis of what you  
25 know. You don't know what's in those 11,000

1 pages; correct?

2 THE WITNESS: Right, right. Correct.

3 MR. MacGILL: Okay. Thank you.

4 Q. (By Ms. Nokes) So you have no knowledge?

5 A. I have no knowledge, no, ma'am.

6 Q. You reference in the letter we just read  
7 that your sin had cost you everything over the last  
8 seven days?

9 A. Uh-huh. Uh-huh.

10 Q. What would it have cost you if it had come  
11 to light 12 years before when you committed the sin?

12 A. Probably some speaking engagements with the  
13 Southern Baptist Convention, but I really don't  
14 believe it would have cost me my church. I think I  
15 could have led them through that.

16 Q. How would you have done that?

17 A. By telling them that I did just what they  
18 do when they sin.

19 Q. Which would be?

20 A. Repent and ask God to forgive me and get  
21 counseling and accountability and move forward. The  
22 very things that I did. As a matter of fact, I don't  
23 even know what anybody else can answer that and show  
24 a principle anywhere, in history or in life, of what  
25 else to do. I mean, unless there's more hoops to

1 jump through. So if somebody wants to get  
2 forgiveness on Sunday, come to a class because it  
3 will take you the next 14 years to be able to get  
4 forgiven.

5 Q. You would agree though, Mr. Hunt, that  
6 pastors are called to a much higher standard than  
7 your run-of-the-mill Christian, correct?

8 A. No, not really. I don't find that in the  
9 Bible. I know that teachers, any teacher, anyone  
10 that's in leadership, certainly they may expect more  
11 of us. But to say there's a verse to say, We want  
12 you to know you will be judged with a different  
13 judgment because you are a pastor. We make  
14 statements, but that is not a biblical principle to  
15 support that statement --

16 Q. And you --

17 A. -- that I'm aware of.

18 Q. You heard Bart Barber's testimony, current  
19 SBC president. And did you listen in on his  
20 deposition?

21 A. Yes, I did.

22 Q. And did you hear him answer questions about  
23 the biblical qualifications for being a pastor?

24 A. I did, yes, ma'am.

25 Q. Did you disagree with his testimony?

1           A.    He couldn't remember what they were. I  
2 enjoyed watching that Baptist history Ph.D. that  
3 couldn't quote a verse that referred to it, and ya'll  
4 had to tell him that he couldn't open his Bible. So,  
5 yes, I did watch that.

6                   And here's the question I would ask if I'm  
7 permitted.

8           Q.    Go ahead.

9           A.    I would say if a person cannot be pastor if  
10 they are not above reproach, does that mean constant,  
11 habitually for all of their life if they ever cross a  
12 line, they are totally out? God kicks them out? He  
13 can forgive a Moses that murdered a man and put him  
14 into sin. David can still be the king. He killed a  
15 man and murder. Peter denied knowing Jesus and  
16 cursed him. And, yet, so in the moment that I did  
17 what I did, that really was a moment of: You're not  
18 living above reproach, but you can get back into  
19 fellowship with God. If not, my life is over. The  
20 church has nothing to offer. The gospel ran out of  
21 power for me. The death of Jesus was not for all of  
22 my sins, just part of them. So.

23           Q.    The biblical qualifications go beyond just  
24 being above reproach, though, correct?

25           A.    Correct.

1 Q. It includes being faithful to one wife?

2 A. Correct. Right. And I am.

3 Q. Were you on July 10th?

4 A. For 20 minutes of a 53-year marriage. Have  
5 you ever lied?

6 Q. I have.

7 A. You have? Could you get forgiveness?

8 Q. I'm not a pastor.

9 A. No, but can you -- Oh, a pastor can't get  
10 forgiveness for lying?

11 Q. I think a pastor can absolutely get  
12 forgiveness. I'm asking about the --

13 A. I meet --

14 Q. -- biblical qualifications to you being a  
15 pastor.

16 A. I meet the qualifications.

17 Q. Despite having been unfaithful?

18 A. For being unfaithful in a moment of  
19 subduction and being stalked, absolutely. And  
20 grateful to God it didn't go any further, thanks to  
21 me, and that I got out of there. And that's my  
22 testimony.

23 Q. I want to look at the complaint.

24 MR. MacGILL: Counsel, we have been going  
25 about an hour.

1 MR. BESEN: Yeah.

2 MR. MacGILL: Why don't we take a break and  
3 then we'll come back to the complaint.

4 THE VIDEOGRAPHER: The time is about 2:17  
5 p.m. We are off the record.

6 (WHEREUPON, a recess was taken.)

7 THE VIDEOGRAPHER: We are back on the  
8 record. The time is 2:42 p.m.

9 Q. (By Ms. Nokes) Mr. Hunt, when did you  
10 decide to initiate this lawsuit?

11 A. I knew that something had happened to be  
12 able to get the report together and I wanted to be  
13 able to know. I wanted -- I wanted somebody to be  
14 able to verify the report. And so I knew that the  
15 only way I could do that is get a good trial lawyer.

16 Q. And when did you come to that decision?

17 A. Gosh. Times, dates. Let's see. My wife  
18 had had -- and I had had many discussions about it.  
19 I feel like in the context of the attorneys we did  
20 have, that helped us to start with it too, that it  
21 was more of: We can defend you. I weren't looking  
22 to be defended. I was looking to get on the offense  
23 and go after Guidepost to find out what happened to  
24 me.

25 Q. And how did you end up choosing Mr. MacGill



1 and your legal team?

2 A. One of my really good friends knew Rob and  
3 we vacation a lot together. And he said, I would  
4 like for you to meet one of my friends and have a  
5 conversation. So it just started that way.

6 Q. And are you personally paying your legal  
7 fees?

8 MR. MacGILL: Objection to the form.  
9 Objection. How does that relate to this, your  
10 discovery rights here?

11 MS. NOKES: It relates to damages and his  
12 financial condition. And he's very much put his  
13 finances at issue in the case. It's not  
14 privileged.

15 MR. MacGILL: So remind me, has the SBC --  
16 are we -- yes, you know what, I think because of  
17 the punitive damage claim that we are pursuing  
18 against the SBC and the punitive damage claim  
19 against the EC and the punitive damage claim  
20 against Guidepost, I can see some rationale for  
21 this. Why don't we take it question by  
22 question. But because of those punitive damage  
23 claims, and especially in light of the testimony  
24 today and the testimony in the recent weeks, I  
25 think that's fair, to at least go a question or



█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

6 Q. Have you talked to anyone besides your  
7 lawyers or your wife about your claims in this case?

8 A. Make sure I understand, about my claims  
9 like about the lawsuit?

10 Q. Yes.

11 A. Just people that would ask. People are  
12 always asking me, especially if I'm out traveling,  
13 pastor may say: How is your lawsuit going? Say,  
14 we're great force. We're in the midst.

15 Q. Do you go into any more detail?

16 A. With really close friends, I have.

17 Q. With Jim Law?

18 A. I have not had a conversation with Jim Law  
19 in 23 months. The report severed that relationship.

20 Q. With your restoration team?

21 A. Yes, they would. Because part of the  
22 restoration team was my pastor. It was Steven Kyle.

23 Q. And is there anyone else who has knowledge  
24 about the claims or your claim damages in this case  
25 that we haven't talked about in some way today?

1           A.    When you say "claim damages," you mean like  
2 we're --

3           Q.    Where you are asking the executive  
4 committee and the Southern Baptist Convention and  
5 Guidepost each to pay you money as a result of this  
6 lawsuit.

7           A.    I think maybe I -- my lawyer may have to  
8 help me here.  But I just know that I was asked to  
9 have a forensic accounting done.

10          Q.    Your expert?

11          A.    So, yes.  So he did that.  But I have not  
12 ever said I'm looking for a claim.  I noticed there's  
13 one suit against the Southern Baptist Convention  
14 where they are suing Southwestern.  He says I'm  
15 asking for 5 million.  I have never asked for any  
16 amount or anything.  I'm just giving information.

17                MS. NOKES:  Okay.  This is the complaint in  
18 its entirety with the exhibits.  Marked it as  
19 Exhibit 17.

20                (Defendants' Exhibit 17, Complaint, marked  
21 for identification.)

22          Q.    (By Ms. Nokes) Have you seen this document  
23 before?

24          A.    Yes.

25          Q.    And have you read all of it?  We are not

1 going through this one line by line.

2 A. All this? No, I just read my section.

3 Q. Well, this is the Johnny Hunt versus  
4 Southern Baptist Convention, Guidepost Solutions and  
5 the executive committee lawsuit.

6 A. Oh, no, I haven't. Unless it's -- unless  
7 this is made up of what you-all send me in documents,  
8 then I read. So I don't know how this works, so I  
9 just --

10 Q. This is the very first document. This is  
11 the lawsuit itself, the complaint where your  
12 allegations against the three defendants are set out.  
13 And my question is just: Did you see it before it  
14 was filed?

15 A. All of this?

16 Q. Yes.

17 A. No, ma'am.

18 Q. Did you see this first page that you have  
19 in front of you?

20 A. Yes.

21 Q. And I'm going to read paragraph 3 on  
22 Page 1. It says, But Pastor Johnny has also made  
23 mistakes in his life. In particular, in 2010, after  
24 his term as SBC president had ended, Pastor Johnny  
25 had a brief inappropriate extramarital encounter with

1 a married woman. Some of the precise details are  
2 disputed, but at most, the encounter lasted only a  
3 few minutes and it involved only kissing and some  
4 awkward fondling. It is undisputed that Pastor  
5 Johnny abruptly ended the encounter. Both Pastor  
6 Johnny and the woman disclosed the encounter to their  
7 spouses, and they jointly sought counseling and  
8 forgiveness.

9 Is that an accurate statement?

10 A. It is.

11 Q. So I think you had said earlier that it was  
12 you who told Jane Doe's husband. Was it you or --

13 A. Well, I did and I just assumed, when I read  
14 that, maybe she was referring to the fact that there  
15 was a time that she told him more or told him. But,  
16 no, I am the one that told him.

17 Q. And it also says that, The encounter  
18 involved kissing and awkward fondling.

19 Is that accurate?

20 A. The kissing is referring back to that kiss  
21 on the forehead.

22 Q. Well, your complaint says the encounter  
23 lasted only a few minutes, and it involved only  
24 kissing and some awkward fondling. Do you read that  
25 to refer to some instance other than the encounter?

1           A.    I read it as I -- asked if I kissed her, it  
2 was only on the forehead that time. My lips have  
3 never touched that woman's lips.

4           Q.    You have heard all the depositions in this  
5 case?

6           A.    Uh-huh. Yes, ma'am.

7           Q.    Looked at a lot of documents. Tell me in  
8 your own words what the executive committee of the  
9 Southern Baptist Convention did wrong?

10           MR. MacGILL: Object to the form of the  
11 question. You may answer.

12           A.    Okay. Maybe I will be proved wrong. But  
13 I -- I don't see where they would have had time to  
14 verify the report. They took a report while taking  
15 all the risks since Guidepost indemnified themselves,  
16 we take all the risks. Did you verify this? Why  
17 would you not call? Are there two parties involved  
18 here? Is there a person that's accused of doing  
19 wrong and one acknowledging doing wrong? Is it fair?  
20 Is this justice that you would spend 11 interviews  
21 with a lady getting a story that you need, while  
22 never interviewing me until two days before the  
23 report and then it be an ambush. And why would they  
24 receive questions and I never received questions? So  
25 my thoughts are: I have served you as a Southern

1 Baptist 50 years. This is the way you treat your  
2 leaders, your men that have given millions to the  
3 cause and -- and leadership of your life? This is  
4 the way you treat us? You call us and ask us is this  
5 accurate? No one called.

6 We are trying to find now all of the emails  
7 between Johnny Hunt and the EC and the SBC. There  
8 are none either way. I have heard nothing from the  
9 Southern Baptist Convention. I am cancelled.

10 Q. (By Ms. Nokes) And same question as to the  
11 convention, your answer may be the same?

12 A. It would be the same, yes, ma'am.

13 Q. And you're still a Southern Baptist?

14 A. We no longer support the national  
15 convention. We send only on state level and the  
16 church that we are in.

17 Q. And by "we," you mean Highland Park?

18 A. Highland Park, yes, ma'am.

19 Q. But it is affiliated with the Florida state  
20 convention?

21 A. Florida convention, yes, ma'am.

22 Q. How long has it not given to the  
23 cooperative program?

24 A. I think Steven made that decision after the  
25 credentials committee told him who could preach in



1 his pulpit.

2 Q. And you are seeking monetary damages as  
3 part of your lawsuit, correct?

4 A. I am letting my attorney lead me in what I  
5 need to produce, but I have no figure. I am seeking  
6 first and foremost truth from Guidepost. I want the  
7 truth to be revealed on [REDACTED] and [REDACTED] [REDACTED] If I  
8 were going to get one of two things, I want the  
9 truth.

10 Q. And you recognize that any money that is  
11 awarded to you from the executive committee or the  
12 Southern Baptist Convention would come from  
13 cooperative program dollars?

14 A. Probably come from a lawsuit of their  
15 insurance.

16 Q. You understand, though, that some of it  
17 would come directly from cooperative program dollars?

18 A. They have done a lot of damages.

19 Q. So you are okay with that?

20 A. Absolutely.

21 Q. Do you think that would affect how the  
22 average Southern Baptist in the pews giving to the  
23 mission work and the cooperative program?

24 A. Being a former president of the Southern  
25 Baptist Convention, when word gets out what Guidepost

1 did and how unfair this report is, I predict half of  
2 the Southern Baptist Convention churches will freeze  
3 their assets until they can get to the bottom of this  
4 to see if, indeed, the report was falsified.

5 Q. So that would be about 20,000 churches?

6 A. Probably. Yes, ma'am. But we have already  
7 lost probably around a third of our support from what  
8 I'm hearing.

9 Q. Nationally?

10 A. Nationally. Less that's coming in.

11 Q. Mr. Hunt, I want to go back to July 25th of  
12 2010. You referenced 20 minutes a few times during  
13 our back and forth today. Is that about how long the  
14 encounter with Jane Doe --

15 A. It was a very brief encounter. And I  
16 believe she even testified to the same, that it was a  
17 brief encounter.

18 Q. And would you say 20 minutes?

19 A. I would say 20 to 30 minutes, you know, it  
20 was a brief -- brief amount of time.

21 Q. And of that time, was the time on the  
22 balcony five minutes?

23 A. Yes. It was very short. Because it was  
24 extremely hot on the balcony.

25 Q. So the time inside the condo would have

1 been 25 to 30?

2 A. Probably. Probably just 15 or 20, 25  
3 minutes, somewhere in that timeframe.

4 Q. Okay. What was Jane Doe wearing? What was  
5 her attire?

6 A. She had on short shorts. And a -- best I  
7 remember, a halter top.

8 Q. Okay. Were the short shorts, like, running  
9 shorts or?

10 A. Oh, no. No, they were just short shorts.  
11 They were not running shorts. They were not  
12 Lululemon or Nike.

13 Q. Blue jean, denim?

14 A. I don't remember that.

15 Q. And you testified earlier that when you  
16 went into the condo, she sat down on the couch?

17 A. She sat at one end, and I sat at the other  
18 end. She just said -- I was going to leave, she  
19 said, No, please don't. Please be seated and let's  
20 just talk. And I said, Are you having marital  
21 trouble? And best I remember is sort of along the  
22 lines, It's been better. But we didn't go into  
23 detail about that.

24 Q. And what other conversation did you have  
25 there on the couch?

1           A.     Well, it took a moment because her husband  
2     called her when I was there and she didn't take the  
3     call. I remember that very distinctly. So if it was  
4     an abusive situation, it sure would have been a good  
5     way out to answer her husband's phone. And I think  
6     we could -- again, if his phone was ever surrendered,  
7     we would see that that call came on that afternoon.

8           Q.     And so after he called, what happened next?

9           A.     She asked me if I would come closer to her.  
10    And so I actually came and sat, like, at her  
11    waistline right there where she is. But she had  
12    already spread out on the couch.

13          Q.     Let's go back. When did she -- when you  
14    say "spread out," describe what she --

15          A.     All right. Instead of sitting on the  
16    couch, she turned toward -- I'm sorry. She turned  
17    toward me with her legs down toward me.

18          Q.     I think you said earlier her legs were  
19    spread?

20          A.     Spread, yes, ma'am.

21          Q.     Could you see inside her shorts?

22          A.     I don't remember that.

23          Q.     And at what point did she -- I think you  
24    testified earlier she pulled down her top?

25          A.     When I went and sat besides her.

1 Q. So that's when she asked you to move  
2 closer?

3 A. Exactly.

4 Q. Okay. And what specifically did she do  
5 when she pulled down her top?

6 A. She made reference to the fact, See,  
7 there's a reason that I can't run without a -- a  
8 halter top or what you ladies call those tops you run  
9 in. Because she knows that I was a runner and going  
10 regular. And that's when she text me the next day.  
11 After the alleged assault, she wanted to go on a walk  
12 with me.

13 Q. Was she wearing a bra?

14 A. I don't remember. I mean, and I know you  
15 can have a bra that doesn't have straps across the  
16 top. So I would be guessing.

17 Q. Could you see her breasts when she pulled  
18 down her shirt?

19 A. When she pulled down, absolutely.

20 Q. So they were completely exposed?

21 A. Yes, exactly.

22 Q. And what happened after she pulled down her  
23 top?

24 A. Exactly what her report said and that is  
25 that I fondled and kissed her breast.

1 Q. And so that was not through her shirt?

2 A. That was --

3 Q. That was your mouth on her skin?

4 A. -- on hers, yes.

5 Q. How long did that go on?

6 A. Just a couple of minutes.

7 Q. So when you say you've never kissed her  
8 mouth, you have kissed other parts of her body?

9 A. Yes.

10 Q. And after the breast fondling and the  
11 kissing, what was the next thing that happened?

12 A. Okay. And let's be real careful to say in  
13 this very consensual relationship. This is not a  
14 tense lady. This is a very welcoming lady.

15 Q. What was she doing to indicate that she was  
16 consenting to this sexual encounter?

17 A. Enjoying it.

18 Q. How did she indicate that?

19 A. By no resistance whatsoever. No frowns  
20 whatsoever.

21 Q. Was there any talk back and forth?

22 A. I don't remember a conversation. She's a  
23 very quiet person.

24 Q. Did you find her attractive?

25 A. She's an attractive lady, of course.

1 Q. And were you aroused during the encounter?

2 A. No, I had just had cancer surgery and that  
3 was not a possibility. And while I was touching her  
4 breast, she was attempting to get her hands up my  
5 swim short leg. And so -- but never did. And then  
6 when I attempted to pull her shorts down -- with her  
7 aid of raising up to make it easy -- and that's when  
8 I came to myself and said, No, I'm out of here. I  
9 love my wife. And I'm sorry. This should have never  
10 happened. And I left.

11 And then how did I know she was consensual?  
12 Because she said, Don't let this be over. This is --  
13 this is just a first day. She was going to be there  
14 evidently that week. So this was just a start of  
15 what she had hoped for.

16 Q. And going back to her shorts, did you pull  
17 them down?

18 A. I did. I pulled them down. And then -- I  
19 mean momentarily, and she talks about all this me  
20 asking her to roll over. If she rolled over, she  
21 rolled over on her own.

22 Q. Did she roll over?

23 A. I don't even remember. I mean, when I read  
24 that in the report, I thought, I don't remember this.  
25 But she seems like to me she would sure have to add a

1 good bit of stuff to make it sound like it's an  
2 assault, so.

3 Q. What was the point of pulling down her  
4 shorts? What did you intend to do?

5 A. You know, when you have momentary  
6 forgetfulness of who you are, it don't have to make  
7 sense. It doesn't make sense. I have asked myself a  
8 million times: What was I even thinking? So I think  
9 I was doing what I believed she wanted me to do, even  
10 though I couldn't have gone any further.

11 Q. Did you pull her shorts down past her  
12 knees?

13 A. Probably to her knees.

14 Q. And did you touch her anywhere --

15 A. Absolutely not.

16 Q. So just to be clear, the sexual encounter  
17 was full breast exposure with kissing and fondling  
18 her breasts while they were exposed?

19 A. Correct. Correct.

20 Q. Anything else?

21 A. No, ma'am.

22 Q. Think she's about your daughter's age,  
23 right?

24 A. Uh-huh, uh-huh.

25 MR. MacGILL: And what time, in 2010?



1 MS. NOKES: At the time of the encounter.

2 MR. MacGILL: Okay. So around 33 or 34, is  
3 that what we are talking about?

4 Q. (By Ms. Nokes) She's still -- they are  
5 still about the same -- regardless of what year --

6 A. Right, yes.

7 Q. -- they are in the same age range.

8 A. Yes, ma'am.

9 Q. And what do you think would cause a woman  
10 that much younger than you to have this attraction to  
11 you?

12 A. I wish you could tell me that since you are  
13 a lady.

14 Q. Well, I'm just asking for your --

15 MR. MacGILL: Let me object to the form.  
16 It calls for speculation. Answer what you can.

17 A. I have no idea. Was she in -- was she  
18 unhappy with her husband? Did she see me as a person  
19 she was attracted to? Was she attracted to the early  
20 conversation you and I had, that she liked the fact  
21 that I'm a leader of the denomination, that I have  
22 had a very successful ministry and I'm constantly  
23 helping her husband? I'm not sure. I'd be  
24 speculating.

25 MR. MacGILL: I'm going to make note of the

1 fact -- and this is important -- that, once  
2 again, Guidepost, I think, acting in concert  
3 with the SBC and acting in concert with the SBC  
4 executive committee have embargoed more than  
5 11,000 pages of information that would provide  
6 details and information that might be responsive  
7 to the question. So I just want this court and  
8 this jury to be mindful of the embargo that  
9 continued. He's answered without reference to  
10 more than 11,000 pages of records that the  
11 defense has embargoed.

12 Q. (By Ms. Nokes) Mr. Hunt, was Jane Doe  
13 wearing underwear?

14 A. Yes.

15 Q. Did they come down with her shorts?

16 A. No, they did not.

17 Q. And at any point, did you touch her inner  
18 thigh?

19 A. Absolutely not.

20 Q. Okay. At any point, did you touch her back  
21 side, her buttocks?

22 A. I did not.

23 Q. Okay. Did you touch any part of her body  
24 other than her breasts?

25 A. And her legs when I rubbed her legs with

1 her permission on the porch.

2 Q. No other body parts?

3 A. No, ma'am.

4 MS. NOKES: I think I'm ready to take just  
5 a short break.

6 THE WITNESS: Okay.

7 MR. MacGILL: Why don't we just stay put.  
8 Is that all right? You guys want to talk?

9 THE VIDEOGRAPHER: The time is 3:04 p.m.  
10 Going off the video record.

11 (WHEREUPON, a recess was taken.)

12 THE VIDEOGRAPHER: We are back on the  
13 record. The time is 3:13 p.m.

14 MS. NOKES: Mr. Hunt, I do not have any  
15 additional questions for you on behalf of the  
16 executive committee.

17 THE WITNESS: Okay. Thank you.

18 EXAMINATION

19 BY MR. KLEIN:

20 Q. Good afternoon, Mr. Hunt.

21 A. Good afternoon.

22 Q. My name is Scott Klein, and along with my  
23 colleague, Terry McCormick, we represent defendant  
24 Guidepost Solutions.

25 A. Okay.

1 Q. I'm going to be asking you some additional  
2 questions today.

3 A. Okay.

4 Q. And just to be clear, like Ms. Nokes said  
5 earlier, you and I have never met or spoken before  
6 today. Is that correct?

7 A. That's correct.

8 Q. Now, I'm going to do my best to not go over  
9 the same items or topics that Ms. Nokes went over  
10 because I don't need to keep you or any of us here  
11 any longer than we need to. I may just need to  
12 clarify in some documents and some other items that  
13 were discussed earlier.

14 A. Okay.

15 Q. Fair enough?

16 A. Fair.

17 Q. But my goal is not to bring up again, just  
18 from a different voice, the same questions.

19 A. Okay.

20 Q. Let's start and if I have some delay  
21 between questions, I apologize. It's just trying to  
22 make sure I don't do that.

23 A. Okay.

24 Q. And I'm going to cut through my outline  
25 just to get to the stuff that has not been covered.

1 So I apologize ahead of time. And I have a  
2 tendency -- as you can tell, I'm very loud, which is  
3 a good thing.

4 A. It's a good voice. You make a great  
5 preacher voice.

6 Q. I've heard I have a voice for radio. I  
7 take that in all sorts of different ways.

8 I am loud. I sometimes speak quickly. So,  
9 please, if you don't understand my question, let me  
10 know and I will rephrase it.

11 A. All right.

12 Q. I will ask again that it's against the  
13 common way we talk, but please let me finish just for  
14 the benefit of the record and the court reporter.

15 A. Okay.

16 Q. You probably know what you are going to say  
17 often before I finish my question --

18 A. Uh-huh.

19 Q. -- because you know where my question is  
20 going.

21 A. Uh-huh.

22 Q. That's fair. But do the courtesy, just so  
23 the reporter --

24 A. Yes, sir.

25 Q. -- let me finish so she can catch up, and

1 then you can answer. Fair enough?

2 A. Yes, sir.

3 Q. And I will do the same on my end.

4 So let's start with Ms. Nokes talked to you  
5 earlier about your resignation to Kevin Ezell on  
6 May 13th. Do you remember those questions and  
7 answers?

8 A. I do.

9 Q. Did Kevin Ezell agree with your decision to  
10 resign?

11 A. The only way I know to answer is he didn't  
12 disagree. So I gave it to him. He left, and then he  
13 publishes his letter.

14 Q. And did he -- and you may have said this  
15 earlier, but I just want to make sure I understand  
16 it. Did he ask why or did he not need to because you  
17 already explained to him the circumstances as to why?

18 A. He didn't need to ask why.

19 Q. Because you had already informed him of the  
20 events as you described them here today?

21 A. Exactly, yes.

22 Q. Did you get into the level of detail with  
23 Kevin Ezell that you did in the last set of questions  
24 with Ms. Nokes regarding the specifics of this  
25 encounter, the physicalness, the physicality of the

1 encounter?

2 A. No, sir.

3 Q. Was it left -- I think you had said earlier  
4 that it was just touching or awkward fondling. Did  
5 you use that phrase with Dr. Ezell?

6 A. No, no. I just told him that I had crossed  
7 a line and had gone into a room with another pastor's  
8 wife.

9 Q. And he didn't ask for anything further  
10 about what you meant by that?

11 A. He didn't go -- ask any details.

12 Q. You at the time had a good relationship  
13 with Dr. Ezell?

14 A. We had been friends probably 30 years.

15 Q. You still have a good relationship with  
16 him?

17 A. Haven't heard from him since the report.

18 Q. By your choice or his choice?

19 A. I gave him my story. He wrote his. And  
20 adios.

21 Q. So I also want to now get to, and you've  
22 led me right there, one of the exhibits that  
23 Ms. Nokes has shown you was that second statement  
24 from NAMB. It's Exhibit 15.

25 Do you have the exhibits in front of you?

1 A. Okay.

2 MR. MacGILL: He does right now.

3 MR. KLEIN: Thank you, Rob.

4 Q. (By Mr. Klein) And I believe Ms. Nokes  
5 reviewed this with you. I just have one or two  
6 follow-up questions.

7 First, when Ms. Nokes showed you this  
8 letter earlier today, was that the first time you'd  
9 seen his statement from NAMB or had you seen it  
10 prior?

11 A. I don't remember reading this one after  
12 reading his first. And they were probably maybe on  
13 Baptist Press. I went off of social media, and I was  
14 in a survival mode.

15 Q. So were you aware before reading this  
16 letter this morning with Ms. Nokes that NAMB had  
17 viewed the allegations in the report as credible?

18 A. I believe practically everyone that read  
19 the report viewed them as credible.

20 Q. Well, at the moment, I'm only asking if you  
21 were aware that NAMB had viewed the allegations in  
22 the report as credible?

23 A. I don't know that I could say that.

24 Q. Were you aware prior to seeing this letter  
25 today that NAMB has asserted that the report is well



1 documented and verified with a high level of  
2 professionalism and due process?

3 A. That's their opinion.

4 Q. Yes.

5 A. Yes.

6 Q. And I just want to know if you were aware  
7 of that before seeing this letter today?

8 A. No, sir. No, sir.

9 Q. So reading those or hearing those words  
10 from both Ms. Nokes and now myself, that's the first  
11 time that you knew?

12 A. Of how they said it, yes, sir.

13 Q. Hearing it now, do you agree with that  
14 assessment by NAMB and Dr. Ezell?

15 A. Absolutely not.

16 Q. And you have not had an opportunity to  
17 challenge them about it because you are just seeing  
18 these words now for the first time?

19 A. Yes. I would probably not challenge them.  
20 Because they are not the source of the report.

21 Q. But they are now publishing in this  
22 May 25th letter that's out there published for all  
23 the world to see, they are publishing assertions that  
24 are stating that the report is credible,  
25 well-documented and verified. You don't have a

1 problem with that?

2 A. I believe being in the SBC, being the  
3 senior VP, turning down Kevin's job, being the  
4 president of the convention, I think they are just  
5 being political. They are saying what they think  
6 Southern Baptists want to hear from them. To say if  
7 I believe how they are saying it, how do they know  
8 it's variable? Have they done their discoveries?

9 Q. I don't know and sounds like you don't know  
10 either. I'm just asking --

11 A. I'm confident they -- sorry.

12 Q. Okay. So I appreciate --

13 MR. MacGILL: Hold on. Stop. Let him  
14 finish. Read his answer back, please.

15 MR. KLEIN: Wrong, Rob. He apologized.

16 THE WITNESS: I was talking.

17 MR. KLEIN: He interrupted me and he  
18 apologized.

19 MR. MacGILL: Let's start over. Give the  
20 question and the answer. We don't need to blame  
21 Scott or Pastor Johnny. Let's just make sure we  
22 have a good record here.

23 Q. (By Mr. Klein) There is no one to blame. I  
24 appreciate, Mr. Hunt, you letting me finish. I'm  
25 going to withdraw the question and we will start

1 fresh.

2 Because I frankly have forgot the question  
3 I was going to ask. And I don't think Rob is doing  
4 that intentionally, but that's okay.

5 You had said that you weren't sure -- well,  
6 neither of us knew, sitting here today, whether or  
7 not they verified it. My question to you was: Are  
8 you challenging the assertion, now that you have seen  
9 it now, that they view the report as being verified  
10 with a high level of professionalism?

11 A. I would say they spoke uneducatedly.  
12 Further, what proof do they have it's a report of  
13 verity?

14 Q. Yes. I'm just asking you and you have  
15 given me an answer, which is fine.

16 A. Right.

17 Q. Let's move on to a different subject.

18 A. Okay.

19 Q. Let's talk about your retention of emails  
20 and text messages, which have been discussed a little  
21 bit today. I'm going into a little more detail.

22 A. Okay.

23 Q. Your counsel has represented to us that  
24 prior to this litigation in March of 2023, that it  
25 was not your practice to keep text messages and

1 emails. Is that correct?

2 A. Correct.

3 Q. Did you routinely -- let's talk about texts  
4 first, so there's no confusion.

5 A. All right.

6 Q. And then we will talk about emails. So as  
7 to texts, was there a practice for you to routinely  
8 delete texts or was it more random?

9 A. It was routinely. It was a habit. It was  
10 a: Let's get this phone cleaned up and make sure I  
11 have answered all my texts, emails. Done with them.  
12 Move on.

13 Q. So was it after you have read them, you  
14 would just swipe and delete, or was it a weekly event  
15 or something else?

16 A. It could be a daily event, read them, make  
17 sure they are answered if they need an answer, delete  
18 and move.

19 Q. What about with regard to emails, same  
20 practice?

21 A. Same practice.

22 Q. So if we were to sneak into your office  
23 tonight without you knowing and look in your inbox,  
24 there would be very little emails in your inbox?

25 A. Probably 20, maybe.

1 Q. I promise I won't do that, but I will take  
2 your word for it.

3 You said you changed phones, meaning the  
4 phone you had in 2010, certainly not the same phone  
5 you had in 2022?

6 A. Correct.

7 Q. Do I have that right?

8 A. Yes, sir.

9 Q. The phone you had in 2022, is that the same  
10 phone you have today?

11 A. In '22, yes, sir.

12 Q. When did you switch to that current phone?  
13 We know it was at least in 2022. How much prior to  
14 that did you purchase the phone that you are  
15 currently using?

16 A. Okay. When I was in counseling, one of the  
17 things that we discussed and it's because of my  
18 nature of being available to pastors, I was  
19 attempting to return every call, answer every email,  
20 and someone said -- and my wife along with them, you  
21 are too accessible to the world. You need to get a  
22 new number. And so we just changed phones at that  
23 time.

24 Q. When was that? I'm sorry.

25 A. That would have been the -- after -- around

1 end of the summer of 2022. I'm sorry, 2022, 2010.

2 2010. So in the time of my counseling and all.

3 Q. And the counseling you are talking about is  
4 with Roy?

5 A. Roy Blankenship, yes, sir.

6 Q. So the phone you currently have, you have  
7 had that same phone since at least 2011?

8 A. Correct.

9 Q. And I believe you said it was an iPhone?

10 A. Correct.

11 Q. You haven't upgraded to a new version of  
12 the iPhone?

13 A. Yes. I have gone up, but I still kept the  
14 same number in iCloud.

15 Q. Same number. Because of iCloud, did the  
16 texts and emails just transfer over to each new  
17 upgraded device?

18 A. They did.

19 Q. Do you know when you started preserving  
20 emails in connection with the claims that you  
21 ultimately brought in this lawsuit?

22 A. I still don't keep them.

23 Q. You still don't keep them to this day?

24 A. No, I figure my attorneys are handling any  
25 emails that are important for me.

1 Q. Are you aware that there's a current  
2 obligation for you to retain your emails and text  
3 messages in connection with this lawsuit?

4 A. Let me make sure I understand your  
5 question.

6 Q. I'm not looking to confuse you or trick  
7 you. Let's make sure we're talking the same  
8 language.

9 A. You mean from -- like from who?

10 Q. Anything relevant -- I'm not sure you  
11 should be deleting anything, but certainly with  
12 regard to any current texts or emails relating to the  
13 claims that you have brought in this lawsuit, that  
14 you are not permitted to delete any of those. So  
15 let's just start with that.

16 A. Uh-huh.

17 Q. Are you testifying that -- and maybe  
18 unwittingly and unknowingly -- but are you testifying  
19 that you have been still deleting texts and emails --

20 A. Yes.

21 Q. -- as they come in once you are done  
22 reading them?

23 A. Yes, the texts, yes, because they haven't  
24 related to the case. The emails, I give them to my  
25 wife and she files everything.

1 Q. So those are still retained?

2 A. They are still retained, yes.

3 Q. The texts, you made the determination on  
4 your own whether or not a text was germane to the  
5 case, and if it was, you have kept it; and if not,  
6 you have deleted it?

7 A. Yes. But I don't -- I can't even really  
8 think. There may be a couple that we have retained  
9 and we have a record of, and I guess that's why my  
10 phone is at forensic now.

11 Q. And as far as you know, have you produced  
12 the texts that were on your phone that were germane  
13 to this case?

14 A. The last time we did it, I don't know that  
15 we found but maybe two text messages that related to  
16 the case.

17 Q. In May of 2022, Ms. Nokes asked you and you  
18 acknowledged that you first retained lawyers in  
19 connection with the upcoming release of the report,  
20 correct?

21 A. Right. Yes, sir.

22 Q. And that was not Mr. MacGill's firm, that  
23 was a different firm. Is that correct?

24 A. Correct. Yes, sir.

25 Q. At that time, were you made aware of the



1 need to preserve any texts or emails that related in  
2 any way to the claims that you brought?

3 A. To the claim. Yes. And I believe my wife  
4 has all of those.

5 Q. And she does?

6 A. Yes.

7 Q. And when you say your wife has them, how  
8 does she get them?

9 A. I forward them to her.

10 Q. That's emails. What about texts?

11 A. I think I have only had about two texts,  
12 and they have been produced.

13 Q. And so you are saying that since May of  
14 2022, you believe there are only two responsive --  
15 and when I say "responsive," that's a legal word --  
16 germane or relevant texts that relate to this case  
17 and you've produced them both?

18 A. And if there are others, they will be  
19 produced soon.

20 Q. Well, I understand that. But my question  
21 is currently, as far as you know, you have only  
22 produced, you say, two. Whether more get produced,  
23 you have only produced approximately two so far?

24 A. And, again, I want clarity. I mean, like I  
25 found an old text from [REDACTED] So is that what you

1 are referring to? I want to make sure I follow your  
2 questioning.

3 Q. Yes. I am just trying to find out what  
4 efforts you made to retain responsive or relevant  
5 texts and emails in this case, just to make sure, as  
6 your lawyer has claimed that we have less than  
7 perfect in our document preservation and productive,  
8 I'm trying to see if you have been less than perfect  
9 in your document retention. So I'm just trying to  
10 find out what efforts you have made.

11 A. Again, for clarity sake, you are saying if  
12 I get a text like, say, from my lawyer or are you  
13 saying I get a text from a friend saying, How is your  
14 case going?

15 Q. I'm looking for anything other than lawyer  
16 communications. And I just want to know what you  
17 have done with them. I think I have your answer.  
18 You said there are only a couple of texts and you  
19 have produced those?

20 A. Yes, correct.

21 Q. But you said you still have the policy of  
22 deleting texts that you have had throughout?

23 A. Yes.

24 Q. So let me now show you a couple of letters  
25 and make sure we can get some clarity here.

1 A. Okay.

2 (Defendants' Exhibit 18, Letter to Bundren  
3 from MacGill, 12/14/23, marked for  
4 identification.)

5 MR. KLEIN: I only have one for your team,  
6 sorry. Actually, I lied. I have two for your  
7 team.

8 Q. (By Mr. Klein) Mr. Hunt, I have just handed  
9 you a letter that's been marked Exhibit 18. And just  
10 for the record, it's a letter on MacGill PC  
11 letterhead dated December 14th, 2023 addressed to  
12 Brandon Bundren at the Bradley firm. I'm only going  
13 to ask you about one portion of this letter.

14 A. Okay.

15 Q. I'm just curious. Do you remember seeing  
16 this letter --

17 A. I do.

18 Q. -- before it was sent?

19 A. Yes, sir.

20 Q. If you can turn to the last page of the  
21 letter where Mr. MacGill's signature is on. And that  
22 last dash that says: Scope of collection. Do you  
23 see where I'm reading?

24 A. Yes, sir.

25 Q. It says, Plaintiff has undertaken a

1 reasonable search for responsive documents. As a  
2 general practice, prior to the filing of this action,  
3 Plaintiff did not retain emails and text messages.

4 Do you see where I have read?

5 A. Yes, sir.

6 Q. And I think I have asked you this before,  
7 but that is an accurate statement?

8 A. Yes, sir.

9 Q. And, again, that's for both personal and  
10 business emails and texts, that was your general  
11 practice?

12 A. Unless it's something that we felt we  
13 needed to file and I gave it to Janet. To go back,  
14 for clarity, I don't even know how to file on a  
15 computer. I am not IT savvy, period. So if I  
16 receive an email and you were to say, Save that, I  
17 would think: How? So I would send it to Janet. She  
18 would not only save it, but she would put it in a  
19 file.

20 Q. I understand that. But with texts, you are  
21 certainly --

22 A. Oh, with texts, yeah.

23 Q. Let's make sure we don't speak over each  
24 other. With texts, you are certainly tech savvy  
25 enough --

1 A. I am.

2 Q. -- to delete a text?

3 A. Correct.

4 Q. Now, if I can show you now another letter,  
5 which we will mark as Exhibit 19.

6 (Defendants' Exhibit 19, Letter to Jacobson  
7 and Mintz from MacGill, 1/15/24, marked for  
8 identification.)

9 Q. (By Mr. Klein) This is a letter marked as  
10 Defendants' Exhibit 19. It's a letter on MacGill PC  
11 letterhead, dated January 15th, 2024, addressed to  
12 John Jacobson and Steven Mintz and Terrence  
13 McCormick. Have you seen this letter before,  
14 Mr. Hunt?

15 A. Yes, I have seen this letter.

16 Q. Again, I'm going to turn right to that last  
17 page on the last bullet point.

18 A. Okay.

19 Q. On Page 3 that says, "Text Messages." Do  
20 you see where I'm reading?

21 A. I do, yes, sir.

22 Q. As general practice prior to the filing of  
23 this action, Plaintiff did not retain email -- emails  
24 and text messages. Do you see where I have read?

25 A. Yes, sir.

1 Q. That sounds similar to the last letter.

2 That's an accurate statement as of January 15, 2024?

3 A. Yes, sir.

4 Q. We understand -- well, actually, I'm going  
5 to back up for a second. You say that's an accurate  
6 statement, but it sounds like you do retain emails.  
7 You just send them to Janet?

8 A. My wife, yes.

9 Q. So in your mind, sending them to your wife,  
10 is that not retaining them?

11 A. That would be retaining.

12 Q. The next sentence says, We understand the  
13 plaintiff does not have his same phone that he used  
14 in 2010 when the encounter occurred. You just  
15 clarified that you got a new phone soon after that,  
16 correct?

17 A. And new number, yes.

18 Q. Exactly.

19 Next sentence, Moreover, while Plaintiff  
20 had communications with those identified in his  
21 response to Interrogatory Number 11 -- I will show  
22 you that shortly -- we understand that none of these  
23 were substantive conversations. Do you see where I  
24 read?

25 A. Yes, sir.

1 Q. Who determined that these communications  
2 were not substantive? Did you?

3 A. I guess my attorney.

4 Q. Yes. I don't want to know about  
5 conversations you had with your attorney.

6 A. Right.

7 Q. I just wanted to know if you made that  
8 decision or if someone other than you made that  
9 decision? And if so, who?

10 A. I would say my attorneys.

11 Q. You did not make that decision?

12 A. It may have been asked about some. I can't  
13 think of any in particular. But.

14 Q. So that last sentence that I read, ending  
15 with, We understand that none of these were  
16 substantive conversations, does that mean that you  
17 have certain communications but did not produce them?  
18 Or did you delete them? Which one?

19 A. I don't remember having any that had  
20 anything to do with the case.

21 Q. But I still just want to understand just  
22 procedurally whether that means you retained them and  
23 just felt they were not responsive or you deleted  
24 them and would not know if they were not responsive?

25 A. If I deleted them, I would say it's because

1 they are not responsive.

2 Q. But I don't want to know if you deleted  
3 them. I wanted to know what you actually did. Did  
4 you delete them?

5 A. I don't know what you are talking about.

6 Q. Well, neither do I. That's why I'm asking  
7 you the questions. They're your text message?

8 A. General- --

9 MR. MacGILL: Nobody knows what you are  
10 talking about. Let's try again and see if we  
11 can get some understanding of what you're  
12 talking about.

13 MR. KLEIN: No, I think he does. He's just  
14 answering as best he can.

15 A. Yes.

16 Q. (By Mr. Klein) Which is inconsistent with  
17 some of these letters.

18 Do you have access to the emails that you  
19 forward to your wife?

20 A. Yes.

21 Q. And how do you have that access?

22 A. She files everything. She's a good  
23 bookkeeping person, so she don't throw anything away.

24 Q. When you say "file," are you using that  
25 term meaning that electronically, she puts them in a



1 folder on a desktop or on your computer?

2 A. I think both. I think that, and I think  
3 then she makes prints -- copies of them. But when I  
4 say the things I forward to her, it's really stuff  
5 that your firms are sending me. We are not getting  
6 rid of any of that. That's the only communication  
7 I'm having about the case that I feel is something  
8 substantive to keep.

9 So when something like this comes, I will  
10 assure you, she's got that. And that's where I was  
11 asking for clarity: Is this what you are talking  
12 about? Something like this? Or -- because I'm not  
13 having communication with anyone in detail about my  
14 case.

15 Q. I'm just trying to understand your  
16 retention policy of texts and emails.

17 A. Okay.

18 Q. And we are almost done. I would just note  
19 that in those emails that you still have access to,  
20 if there are any that are responsive to outstanding  
21 document requests, there is a continuing obligation  
22 to produce. And I would ask that you look and  
23 produce them if they are responsive.

24 A. And you will have my wife here tomorrow, so  
25 she will be able to answer that with greater clarity

1 than me.

2 Q. And we will ask her, but I wanted to make  
3 that record clear with you as well.

4 A. Got it. Yes, sir. Got it.

5 Q. Thank you.

6 (Defendants' Exhibit 20, Plaintiff's  
7 Response to Guidepost Solutions LLC's First Set  
8 of Interrogatories, marked for identification.)

9 Q. (By Mr. Klein) Mr. Hunt, I've handed you  
10 what's been marked as Exhibit 20. And for the  
11 record, it's Plaintiff's response to Guidepost  
12 Solutions, LLC's first set of interrogatories. And I  
13 would ask you to look through these and when you are  
14 done, just let me know if this document is familiar  
15 to you?

16 A. Yes, this is. I have read this.

17 Q. Thank you. If you can turn to Page 14 of  
18 this document. On top, it says, Verification of  
19 responses to interrogatories only. Let me know when  
20 you are at that page.

21 A. I have every page but 14.

22 Q. Well, I think it's not numbered 14. It's  
23 the one right before 15.

24 A. Oh, okay. Right in the back there.

25 Verification --

1 Q. By that, I meant that I -- "Verification of  
2 Responses." Do you see that?

3 A. Yes, sir.

4 Q. Is that your signature next to the printed  
5 word "signed"?

6 A. That is.

7 Q. And you understand that by signing this,  
8 you were verifying, as it says here, that, The  
9 factual matter stated for me in the above responses  
10 to interrogatories are either based on my personal  
11 knowledge or information supplied or assembled at the  
12 direction of me. And I believe the factual matter  
13 stated in the above responses to the interrogatories  
14 is true and correct. Did I read that accurately?

15 A. Yes, sir.

16 Q. Time out. Technical difficulties.

17 And you understood when you signed it that  
18 you were signing it and verifying to the truth of  
19 these answers, correct?

20 A. Yes, sir.

21 Q. Great. Let's just look at a few of them.  
22 Let's look on Page 7, Question 6, Identify each  
23 person with whom you have had an extramarital  
24 encounter, setting forth the approximate dates and  
25 locations of such encounter. For purposes of this

1 interrogatory, such encounters are not confined to  
2 acts of sexual intercourse, but shall include without  
3 limitation, kissing, awkward fondling or any other  
4 form of intimate sexual contact.

5 Do you see where I have read?

6 A. Yes, sir.

7 Q. Your answer is none?

8 A. Correct.

9 Q. Is that correct?

10 A. And I'm assuming that we are talking about  
11 beyond the [REDACTED]

12 Q. Well, the question wasn't written that way.  
13 So if you are telling me that you want to change your  
14 answer or you misunderstood the question, that it's  
15 someone other than Jane Doe, I just want to know why  
16 you wrote none there.

17 A. I put none because Ms. [REDACTED] is already  
18 mentioned in the sentence above. So I felt that that  
19 was already in the interrogatories. So to me, to put  
20 anything else would say there were others, and there  
21 are none.

22 Q. If you can turn to question 11 on Page 10.  
23 Let me know when you are there.

24 A. I'm there. Yes.

25 Q. Question 11 says, Identify each person with

1 whom you have had any communications concerning your  
2 extramarital encounter with the survivor, the report  
3 or the allegations in the complaint. Your answer is  
4 after the encounter but before the report was  
5 published, you only had communications regarding the  
6 encounter with Janet Hunt, spouse, Jane Doe, Jane  
7 Doe's husband and Roy Blankenship. After the report  
8 was published, Plaintiff communicated with the  
9 following and you list a series of several bullet  
10 points, correct?

11 A. Yes, sir.

12 Q. So these are all the people that you  
13 communicated with since May 22, 2022 about the report  
14 or the allegations in the complaint, correct?

15 A. Correct.

16 Q. How did you remember all of these names  
17 without having the texts or the emails to identify  
18 these people?

19 A. I don't know that any of these were texts  
20 or emails. My pastor, I talked to him. Kevin Ezell,  
21 I met with him. Jeremy Morton, I met with him. Jim  
22 Law, I met with him. Matt Lawson, we had a phone  
23 conversation, and I sent him a letter. And the  
24 letter is the one that you-all have produced that I  
25 sent to the church. My pastor and his wife, we met

1 and talked. He was part of the accountability.

2 Q. So you are saying none of these were  
3 written communications?

4 A. None of these would have been  
5 communication. These would have all been in person.

6 Q. None of them were written communications?

7 A. Correct. The spiritual care team, I met  
8 with them. Counselor, I was with him. Counselor, I  
9 was with him. Attorneys, we did video calls.

10 Q. About Jim Law, you said you met with him.  
11 How did you meet with Jim Law?

12 A. I met with Jim law, Oh, gosh, probably a  
13 week or 10 days after the report.

14 Q. And was that the last time you have spoken  
15 to Jim?

16 A. We haven't had a conversation and I haven't  
17 seen him since.

18 Q. And you haven't seen him since?

19 A. No, sir.

20 Q. Has he reached out to you?

21 A. No, sir.

22 Q. Have you reached out to him?

23 A. I ran into him -- I said I had not seen  
24 him -- I was at the airport about to get on a tram,  
25 and I saw him. So I spoke to him, and he seemed

1 overjoyed to see me. And just conversations were  
2 light. How are you doing? Good to see you. And he  
3 was still asking questions. I had to board the  
4 plane -- the train to leave. That's the only time  
5 I've been in his presence since.

6 Q. When was that? I'm sorry.

7 A. That was probably in the last, say, three  
8 or four months.

9 (Defendants' Exhibit 21, Letter to  
10 McCormick from Rawlings, 3/22/24, marked for  
11 identification.)

12 Q. (By Mr. Klein) I'm marking this as  
13 Exhibit 21. It's two-sided. One for you and one for  
14 your lawyer.

15 Mr. Hunt, just for the record, this is a  
16 letter dated March 22, 2024 from Taylor English sent  
17 to my colleague Terrence McCormick. As I said, make  
18 sure you look at both sides. I apologize it's  
19 two-sided. Let me know once you are done looking at  
20 it, if you have seen this letter before.

21 A. I don't remember ever seeing this letter.

22 Q. I'll represent to you that this is a letter  
23 that my colleague received from the lawyers  
24 representing FBC Woodstock.

25 A. Okay.

1 Q. We received this letter along with a few  
2 documents that we provided to all counsel. I just  
3 want to ask you really just one question about this.

4 MR. MacGILL: Counsel, when did we get --  
5 when did you send this to us? Just so we know.  
6 This is not Bates-numbered.

7 MR. KLEIN: It was a cover -- the cover  
8 letter was not Bates-numbered. It was a couple  
9 of weeks ago. I can get you the exact date,  
10 Rob, off line.

11 MR. MacGILL: But you did send this letter  
12 to us?

13 MR. KLEIN: I believe this letter was sent  
14 to you as well with the small production.

15 MR. OTCHY: March 26th.

16 MR. KLEIN: We have a voice from afar.  
17 Just for the record, that was my colleague Alex  
18 Otchy, who I think sent it. And he's  
19 representing, Rob, that it was March 26th.

20 Q. (By Mr. Klein) Mr. Hunt, just see if you  
21 can turn to the second page of that letter.

22 A. Okay.

23 Q. The top, the paragraph beginning with the  
24 word "finally." Finally there are a number of  
25 documents we believe are responsive, but privileged.



1 Do you see where I just read?

2 A. Yes, sir.

3 Q. Those are, colon, and the first one says, A  
4 series of text messages -- or a series of texts  
5 between Jeremy Morton and Johnny Hunt around the time  
6 of the SBC report. Do you see where I just read?

7 A. Yes, sir.

8 Q. Do you know why those texts were either not  
9 produced or not placed on a privilege log when we  
10 asked for these types of documents?

11 A. I do not.

12 Q. Do you remember having a series of text  
13 exchanges with Jeremy Morton?

14 A. Mostly around, What are you going to do in  
15 trying to move forward? I don't remember anything in  
16 particular that just relates to the case.

17 Q. Well, his lawyer is at least expressing an  
18 opinion that they believe that those text exchanges  
19 are responsive, but privileged. But you don't have a  
20 specific recollection either way?

21 A. No, sir.

22 MR. MacGILL: Whoa, whoa, whoa. Hold on.

23 MR. KLEIN: Rob, do you want to lodge an  
24 objection?

25 MR. MacGILL: Yes, hold on a second. Okay.

1           Go ahead.

2           Q.     (By Mr. Klein) And I think I got your  
3 answer. You weren't sure either way what they were?

4           A.     Right.

5           Q.     No problem. You can put that document  
6 aside.

7                     Mr. Hunt, in your complaint, you have a  
8 claim for intentional infliction of emotional  
9 distress. Is that correct?

10          A.     Yes, sir.

11          Q.     Are you still pursuing that claim?

12          A.     Yes, sir.

13          Q.     Now, we received an amended damages  
14 report --

15          A.     Uh-huh.

16          Q.     -- from your attorney back in January. And  
17 on that amended damages report, it estimates that the  
18 damages that you have incurred in connection with  
19 that emotional distress claim are between 30 and \$45  
20 million. My question is, do you know how that number  
21 was determined?

22                     MR. MacGILL: Could you hand him the  
23 document? You have misstated the document.

24                     MR. KLEIN: Well, he's capable of saying  
25 that. I --

1           MR. MacGILL: Well, no, I'm saying it. You  
2           have misstated the document. You need to  
3           correct your statement on the record, Counsel.  
4           You are an officer of the court. You have  
5           misstated the document. Give him the document  
6           and there won't be a dispute. If you don't give  
7           him the document --

8           MR. KLEIN: Do you want my microphone as  
9           well to continue the deposition or can I ask my  
10          question? You absolutely are free to lodge your  
11          objection. If you want to take my microphone,  
12          you can ask and answer. At the moment, you are  
13          absolutely free to lodge your objection, which  
14          you have. We don't need the rest of it. And,  
15          of course, he is free to say, I don't remember,  
16          that's not what it says. And then I will share  
17          with him the document if I choose to. At the  
18          moment, I'm only asking for his memory, which is  
19          part of the reason why we are here.

20          MR. MacGILL: Okay. Let's hear the  
21          question back, please.

22          (WHEREUPON, the record was read back by the  
23          reporter as follows:)

24          "Question: From your attorney back in  
25          January and on that amended damages report, it

1 estimates that the damages that you have  
2 incurred in connection with that emotional  
3 distress claim are between 30 and 45 million.  
4 My question is: Do you know how that number was  
5 determined?"

6 MR. MacGILL: One moment, please.

7 Counsel has misstated the documents,  
8 specifically, the document speaks for itself.  
9 It is on the court document, Document 110-9,  
10 pages 3 of 7 and 4 of 7.

11 You may answer.

12 Q. (By Mr. Klein) So my question still stands.

13 A. Okay.

14 Q. Which is my understanding is your amended  
15 damages report claims or estimates that you're  
16 seeking between 30 and -- that a jury could award  
17 between 30 and \$45 million in damages for emotional  
18 distress. And my question is: Do you know how that  
19 number was determined?

20 A. It was just an estimation. It was not a  
21 request. It was in a case like this, if Guidepost is  
22 found guilty, we believe that the courts, the jury  
23 could very well offer that much. So it was just --  
24 it was just mentioned, yes, in that sense, not a  
25 request.

1 Q. And do you know what that was based on,  
2 though?

3 A. My attorney's many, many years of being a  
4 trial lawyer.

5 Q. Fair.

6 Let me ask now some different questions on  
7 the same topic. Have you seen medical doctors to  
8 treat you for this alleged emotional distress harm  
9 that you have claimed?

10 A. No. I don't think it's physical. I think  
11 it's emotional and psychological. So that's why I  
12 went to On Site and the reason my wife and I did an  
13 11-hour intensive with two Ph.D. psychologists.

14 Q. And so were you prescribed any  
15 medication --

16 A. No, sir.

17 Q. -- from anyone?

18 A. No, sir. And the reason is --

19 Q. No question yet.

20 A. All right.

21 Q. Your lawyer will have an opportunity if he  
22 wants to clarify anything.

23 MR. MacGILL: I would like the witness to  
24 be allowed to finish his answer. He's in charge  
25 here. He's not going to let you finish your

1 answer. Nothing I can do about it right now.

2 We will just continue.

3 MR. KLEIN: I thought he was finished. I

4 believe he was finished.

5 MR. MacGILL: Don't worry. Just keep

6 going. It's all right.

7 A. No, I was not finished.

8 Q. (By Mr. Klein) You can finish your answer.

9 You took a break and I took that to mean you were  
10 done. My apologies, Mr. Hunt.

11 A. All right. Yes.

12 Q. You can finish your answer.

13 A. The reason, I didn't want medication to  
14 make me feel what I am not. I want to feel this and  
15 work through it. So I'm not big on a drug that would  
16 make me feel good when things are not good.

17 Q. Have you ever taken medication before when  
18 you weren't feeling good?

19 A. No.

20 Q. You have never been prescribed any  
21 medication when you were not feeling well?

22 A. Oh, for a cold or something or flu, I mean,  
23 but not...

24 Q. At the moment, I'm talking about any  
25 medication.

1 A. Oh, of course.

2 Q. But you haven't taken any medication or  
3 hasn't been prescribed any medication relating to  
4 this emotional harm you are discussing?

5 A. I have not.

6 Q. Did any doctor offer to prescribe you  
7 medication and you turned it down?

8 A. They did.

9 Q. And what medication did they offer that you  
10 should take?

11 A. I have no idea. I'm sorry.

12 Q. That's okay. Did any doctor -- not just  
13 limited to a medical doctor, which my last question  
14 was limited to -- so any doctor, professional, issue  
15 any formal diagnosis with regard to your claim of  
16 emotional harm?

17 A. No, sir.

18 Q. Did they issue any medical reports or  
19 findings regarding their treatment of you?

20 A. On Site came as close of identifying where  
21 I was as a result of the trauma of the report.

22 Q. And how did they identify -- or what did  
23 they identify? I should ask.

24 A. I think you have the report.

25 Q. And so it was in that report?

1 A. It's in that report, yes, sir.

2 (Defendants' Exhibit 22, Plaintiff's  
3 Amended Statement of Damages, marked for  
4 identification.)

5 MR. KLEIN: Give me one moment, if you can.  
6 I may have made -- I have it.

7 You did not mark the amended statement of  
8 damages, did you? I have enough copies. But  
9 you didn't mark it, did you?

10 MS. NOKES: No, no.

11 MR. KLEIN: I don't want to mark it twice.  
12 I'm handing you what's been marked as  
13 Exhibit 22.

14 I need one back. I'm sorry. My bad.  
15 Sorry.

16 Q. (By Ms. Klein) Mr. Hunt, I'm going to ask  
17 you to take a look at what's been marked as  
18 Exhibit 22. Let me know when you are finished.

19 A. Yeah, I have seen this document.

20 Q. You reviewed this document before it was  
21 served by your attorneys?

22 A. Yes, sir.

23 Q. Did you approve of this final version  
24 before it was sent externally?

25 A. Yes, sir.



1 Q. So I just want to clarify what I thought  
2 you said earlier when asked questions by Ms. Nokes  
3 regarding this lawsuit and the monies you are  
4 seeking. You are aware in this lawsuit that you have  
5 submitted damages claims that, if successful, are  
6 seeking, my view from this document, is near a  
7 hundred million dollars worth of damages. The  
8 document will speak for itself, but that a jury could  
9 return a verdict, you are seeking almost a hundred  
10 million dollars. Is that correct?

11 A. Not --

12 Q. Is that your understanding?

13 A. No, sir.

14 MR. MacGILL: Object to the form of the  
15 question.

16 MR. KLEIN: I'm sorry, Rob.

17 MR. MacGILL: Object to the form of the  
18 question. You may answer.

19 Q. (By Ms. Klein) What's your understanding of  
20 what this document claims you are seeking?

21 A. This document is claiming my losses in  
22 damages, which is the same thing the forensic CPA did  
23 as far as losses as a result of the report. The  
24 other is just he said, We have no idea. So he was  
25 just listing. He said, A jury at their discretion,

1 could. They may not.

2 So my understanding was that was just  
3 simply we don't know what happens in a court with a  
4 jury.

5 Q. So you are distinguishing the top category  
6 that talks about lost earnings on the top versus the  
7 rest of the document?

8 A. Correct.

9 Q. And so in your mind, you're seeking -- my  
10 word, but correct me if you want to choose a  
11 different word -- you are seeking, affirmatively, the  
12 damages for lost salary and employment benefits, book  
13 sales, speaking engagements, other lost income, and  
14 the total there says not less than \$15.4 million?

15 A. Uh-huh.

16 Q. Is that correct?

17 A. That's correct.

18 Q. And you are saying the balance of this  
19 chart or this document, you are seeking monetary  
20 relief, but in terms of the amounts, you are just  
21 saying that a jury could award any amount, this is  
22 what you believe you could be entitled to?

23 A. Possibly.

24 Q. But you would agree that you are seeking  
25 monetary relief for these other categories, correct?

1 A. We do plan to file in those areas.

2 Q. You already have filed, right?

3 A. Right, yes, sir, correct. Again, you are  
4 the attorney. I'm not.

5 Q. No. But I just want to -- it is your  
6 lawsuit, though, sir, correct?

7 A. Yes, sir.

8 Q. You were aware when you brought this  
9 lawsuit you were seeking monetary relief?

10 A. Yes, sir. May I respond more to that?

11 Q. To the question I just asked?

12 A. Yes.

13 Q. Sure.

14 A. Did you understand when you-all filed this  
15 report that you-all were going to cause serious  
16 damage in every one of these areas? Making it so  
17 explosive and making it so "impactful," the words are  
18 in the deposition.

19 Q. Well, I thought you were going to continue  
20 with your answer. That's a question. I'm not  
21 allowed to answer your questions.

22 A. No.

23 Q. You set the record. That's fine.

24 MR. MacGILL: We have no objection to you  
25 answering the question.

1 MR. KLEIN: I appreciate that, Rob. I'm  
2 going to decline that, but I thank you for your  
3 offer.

4 MR. MacGILL: Well, and just --

5 MR. KLEIN: That's fine. You can put  
6 document down.

7 MR. MacGILL: And just for the record, he's  
8 been answering as to compensatory. The punitive  
9 damage component in this has not been addressed,  
10 and it is addressed in the way it is, but not  
11 specifically.

12 MR. KLEIN: I understand that.

13 MR. MacGILL: I just want to make sure we  
14 understand each other.

15 MR. KLEIN: I understand. I appreciate  
16 your testimony there --

17 MR. MacGILL: I'm going to give it.

18 MR. KLEIN: -- on that front.

19 Q. (By Mr. Klein) Mr. Hunt, I apologize. I'm  
20 going to try to skip through my outline and --

21 A. All right. No problem.

22 Q. -- try and skip to some stuff that we  
23 haven't yet gone over. I'm not sure if it was gone  
24 over earlier: Are you claiming that there were book  
25 deals that were cancelled as a result of the report?

1 A. Yes, sir.

2 Q. And do you know which ones?

3 A. Yes, sir.

4 Q. Can you identify them for me?

5 A. Harper Collins. For 13 years I did one of  
6 the most popular devotions in America. And they  
7 cancelled me immediately.

8 Q. And was that -- I don't mean to stop you.

9 A. Okay.

10 Q. I did ask for all of them. Is it okay if I  
11 stop after each one so I can ask some follow-up  
12 questions?

13 A. Yes, sir. Sure.

14 Q. Great. So with that one, help me out. Is  
15 that a -- you said for 13 years you have been working  
16 with Harper Collins.

17 A. Uh-huh.

18 Q. Is it an annual revenue that you derive  
19 from them or is it a particular book that you then  
20 produce on an annual or semiannual basis? Explain  
21 that to me.

22 A. Annually, I would do a new devotion, and  
23 then it would hit the market in October of every year  
24 for 13 years.

25 Q. And that stopped when?

1 A. When your report hit.

2 Q. And that arrangement you have with Harper  
3 Collins, is that in a written agreement or document?

4 A. It is.

5 Q. And do you know if you produced that in  
6 this case?

7 A. I'm not sure.

8 Q. We would ask, if it hasn't been produced,  
9 that it be produced.

10 A. I'm confident it has been, yes.

11 Q. That's fine.

12 A. Yes.

13 Q. And I'm not challenging you to remember all  
14 the documents that were produced. I don't remember  
15 seeing it. All I'm saying is we will go back and  
16 check. If it wasn't produced, I'm asking for its  
17 production now.

18 A. Right.

19 Q. Do you know if that book deal or that  
20 agreement with Harper Collins, was that with you  
21 individually or with Johnny Hunt Ministries?

22 A. Johnny Hunt Ministries.

23 Q. Do you remember for the Harper Collins one  
24 how much you were to receive for each of these  
25 annual, you said, devotions, is that what you said?

1 A. Correct.

2 Q. Do you know how much you were to receive?

3 A. Depends on how many you sell.

4 Q. Oh, so it's a person- -- it's a per book?

5 A. It's a per, yes.

6 Q. I should have known that. My apologies.

7 A. That's all right. No problem.

8 Q. You said there was other book deals that  
9 were cancelled. What's the next one?

10 A. I was writing a new book with -- since I  
11 haven't dealt with them in two years. There was  
12 somewhere we listed all of those. We listed the  
13 names.

14 Q. If you don't remember, that's fine. I'm  
15 trying to know your memory for now.

16 A. I had one that I wrote, the book that I was  
17 asked about this morning, we were read from, that  
18 company, I was writing another new book for them, and  
19 it was cancelled immediately. Plus, I was charged  
20 for the stock in inventory because of the report to  
21 the tune of about \$39,000. And then they would no  
22 longer publish me. So they -- my books were  
23 continuing to sell, so about three books there, lost  
24 the book deal, lost the book deal and --

25 Q. Is one of the ones you are talking about

1 now Harvest House?

2 A. There it is. Yes, sir. That's it.

3 Harvest House.

4 Q. The book deal with Harvest House, was that  
5 with you individually or with Johnny Hunt Ministries?

6 A. All were Johnny Hunt Ministries because I  
7 gave the funds to that ministry.

8 Q. I think you had said that earlier, but I  
9 appreciate you clarifying that.

10 Now we're going to talk a little bit now,  
11 just follow up on a few points with regard to that  
12 second Zoom meeting that you had with Guidepost  
13 investigators. I think you had said earlier that at  
14 some point in that Zoom, the investigators asked you  
15 who else they should interview in addition to  
16 yourself. And I believe your answer to Ms. Nokes was  
17 that, yes, you had said Jane Doe and her husband and  
18 Roy Blankenship. Is that correct?

19 A. Correct.

20 Q. At that time, when they were questioning  
21 you on May 12th, did you know at what point whether  
22 the investigators had spoken with Roy Blankenship or  
23 not?

24 A. I did not.

25 Q. You did not know either way?



1 A. I didn't know.

2 Q. Now, I think you have also testified  
3 earlier that at some point during that second  
4 meeting, which was the Zoom meeting, the  
5 investigators mentioned to you that if you remembered  
6 any more details that you should contact them in the  
7 next 24 to 48 hours?

8 A. Forty-eight.

9 Q. Is that correct?

10 A. Forty-eight.

11 Q. Forty-eight hours?

12 A. Yes, sir.

13 Q. Did you contact them the next 48 hours?

14 A. I wouldn't have contacted them if they had  
15 given me 96 hours. I felt threatened by them.

16 Q. In the moment, it sounds like you clearly  
17 felt threatened and frustrated. When you got home  
18 later that day and the next day, did you reconsider  
19 and say: Wait a minute, I probably should let them  
20 know my side of the story and come back to them and  
21 tell them something?

22 A. Sir, I don't feel they wanted my side of  
23 the story. They had already made their mind up.

24 Q. But you don't know that because you never  
25 told it to them, correct?

1           A.     Based on their behavior in that meeting and  
2     the way it transpired and now since I'm on this side,  
3     I must answer with my full knowledge. To know what  
4     they did with the [REDACTED] all the days and hours and  
5     traveling to them and sending the questions ahead of  
6     time.

7           Q.     I'm sorry, but --

8           A.     But I have to answer based on my full  
9     knowledge now. But then --

10          Q.     I want to try to put you back in --

11                   MR. MacGILL: Stop. Stop the  
12     interruptions. Let him finish.

13          Q.     (By Mr. Klein) Go ahead.

14          A.     But then I just -- I didn't trust them. I  
15     feel like they were misrepresenting the truth or they  
16     had received this, as they thought was truth from a  
17     credible witness, before they interviewed the  
18     noncredible witness.

19          Q.     And in your mind, who was the noncredible  
20     witness?

21          A.     They referred to me as that in your report.

22          Q.     I'm sorry, Oh, in --

23          A.     They referred to me.

24          Q.     Understood. And the credible witness would  
25     be Jane Doe and her husband?

1           A.     And the three witnesses.  And if they are  
2 witnesses, I'm going to become a lawyer.  And then,  
3 Number 4, Roy Blankenship is played out in the report  
4 that he's against me.  But he's clearly testified for  
5 me in the sense that he saw it the whole time,  
6 talking to both of us, as being consensual.

7           Q.     But he, in his conversations with the  
8 investigators, as reflected in the report,  
9 acknowledged that there was an encounter that  
10 involved physical intimacy, correct?

11           MR. MacGILL:  Objection to form of the  
12 question.  You can answer.

13           Q.     (By Mr. Klein) You can answer.

14           A.     In the -- in just what I have testified to  
15 just a moment ago, that intimacy, yes.

16           Q.     Yes.  So he acknowledged that in his  
17 conversation with the investigators?

18           A.     Correct.  Correct.

19           Q.     You did not?

20           A.     No, he was -- he was ambushed, though.

21           Q.     In his ambush, he had enough time, though,  
22 in his ambush to relay the fact that he learned that  
23 there was a consensual intimate relationship between  
24 you and someone not your wife, correct?

25           A.     Correct.

1 Q. Is it --

2 MR. MacGILL: I'm late. I'm late. Object  
3 to the form of the question. Lack of  
4 foundation.

5 MR. KLEIN: That's fine.

6 Q. (By Mr. Klein) You had said just a few  
7 minutes ago that you felt it was pointless -- that  
8 may not have been your word, but something to that  
9 effect -- that it was pointless to reach out to the  
10 investigators within 48 hours because they had  
11 already made up their mind. In your mind, is it  
12 consistent with someone who has made up their mind to  
13 offer you to contact them if you had anything more to  
14 add?

15 A. In light of the fact that they did not tell  
16 me what the conversation was about, misled me, and  
17 said we just have a few follow-up on what we have  
18 already discussed with you. This was not a  
19 follow-up. What they did, it was an ambush. And so  
20 who under heaven wants to call an attorney that has  
21 treated you that way?

22 Q. But you still had 10 days between that  
23 interview and the report being issued to think about  
24 that and come back to the investigators with some  
25 information and you chose not to do that, correct?

1 A. That is not correct.

2 Q. You did not have ten days?

3 A. Two days. Two days. Forty-eight hours.

4 It's two days.

5 Q. No, I understand that. And I was not clear  
6 with my question. Yes, I understand you said that  
7 they provided you two days.

8 A. Two days.

9 Q. You had your lawyers on May 19th and  
10 May 20th send letters to Samantha Kilpatrick and  
11 Guidepost about the upcoming report, correct?

12 A. Correct.

13 Q. Let me show you those letters pretty  
14 quickly.

15 MR. KLEIN: Where's the pile of exhibits?

16 It's right there. No, right there. Give me  
17 that whole pile. Thank you.

18 Q. (By Mr. Klein) It's already an exhibit  
19 that's been marked, Mr. Hunt, and I will help you in  
20 a moment. If you can turn to Exhibit 11.

21 A. I have it, yes.

22 Q. Thank you. And you will recall this is one  
23 of the letters that Ms. Nokes --

24 A. Yes.

25 Q. -- showed you this morning?

1 A. Correct.

2 Q. And this firm, Finch McCranie,  
3 M-C-C-R-A-N-I-E, these were the lawyers that you had  
4 retained at this time?

5 A. Yes, sir.

6 Q. You --

7 MR. KLEIN: Rob, watch for the microphone,  
8 yes. Thank you, Rob. You got to fix that.

9 MR. BESEN: It's a motion detector that's  
10 blocked by the screen.

11 MR. KLEIN: I understand. I understand.

12 MR. BESEN: I'm not sure what you want me  
13 to do.

14 MR. KLEIN: I don't know.

15 Q. (By Mr. Klein) Mr. Hunt, at the time this  
16 letter was sent on May 20th, 2022, fair to say that  
17 your attorneys knew that you spoke with the Guidepost  
18 investigators, correct?

19 MR. MacGILL: Counsel, you should not  
20 disclose any communications you had with your  
21 lawyers, or I was asleep at the switch when  
22 counsel for the SBC executive committee asked  
23 you about your communications and got elicited  
24 testimony about your private attorney-client  
25 communications. I should have stopped that, and

1 I should have instructed you not to answer. I'm  
2 going to instruct you not to answer that  
3 question. You may not answer. You have a  
4 privilege. So any communications you had with  
5 this law firm and these lawyers at the Finch  
6 firm, you should not testify to.

7 Q. (By Mr. Klein) And to be clear -- and Rob  
8 has a good point -- I was not looking for your  
9 attorney-client communications. I'm not entitled to  
10 them. I don't want them. And I guess I was trying  
11 to understand just if they were aware -- without a  
12 communication, if they knew that you spoke to the  
13 lawyers without your communicating with them. Were  
14 they aware that -- withdrawn.

15 Were they aware that you spoke to the  
16 investigators?

17 MR. MacGILL: Same thing. Same  
18 communication. You are not to answer as to your  
19 communications to Mr. -- to the Finch law firm.

20 Next question, please.

21 Q. (By Mr. Klein) If you can look at the  
22 second paragraph in the letter, first page.

23 A. Yes, sir.

24 Q. Beginning with "yesterday."

25 A. Uh-huh.

1 Q. Yesterday, we were advised by Anthony  
2 Collura that it is probable that Pastor Hunt will be  
3 mentioned in the report. Do you see that?

4 A. Yes, sir.

5 Q. So clearly at the writing of this letter,  
6 the law firm was aware that you were probable that  
7 you would be mentioned in the report, correct?

8 A. Correct.

9 Q. Nowhere in this letter does it say, Hey,  
10 wait a minute. You should know that any encounter  
11 that my client had with Jane Doe was consensual,  
12 correct?

13 A. Uh-huh.

14 Q. Nothing in there about that, is there?

15 MR. MacGILL: Letter speaks for itself.

16 Q. (By Mr. Klein) You can answer.

17 A. Yes. Yes, if it's not in there.

18 Q. Okay. And nothing in this letter about the  
19 fact that Jane Doe initiated any encounter between  
20 you and her in July of 2010?

21 A. No, sir. And remember, at this point, I  
22 did not know what was going to be in the report.  
23 This abuse that I assaulted or abused her, that's new  
24 language other than an accusation in the ambush.

25 Q. But you will agree, sir, that as of this



1 date, the investigators did not even know your  
2 version of what happened, correct?

3 A. Exactly. They were --

4 Q. Okay. Do you know that there was a letter  
5 sent the day before this, also from your lawyers,  
6 that was directed to a Mr. Collura, are you aware of  
7 that --

8 A. No, sir.

9 Q. -- that said the same thing?

10 A. No.

11 Q. If you can turn back to a document that's  
12 already been recently marked, and it's your response  
13 to Guidepost's first set of interrogatories.

14 MR. KLEIN: I apologize, Rob, I don't  
15 remember what number that is. It's a very  
16 recent one. I just marked it.

17 MR. SANDERS: Twenty.

18 MR. KLEIN: Thank you, Patrick.

19 Q. (By Mr. Klein) I'm going to point you to  
20 interrogatory 4 on Page 6.

21 A. Okay.

22 Q. Let me know when you are there.

23 A. I'm there.

24 Q. Thank you. The answer to Question 4, I'm  
25 not going to read the first paragraph, which is more

1 of legalese objections. I'm going to start with the  
2 paragraph beginning "in 2010." Do you see where I'm  
3 about to read?

4 A. Yes, sir.

5 Q. Great. In 2010, after his term as SBC  
6 president had ended, Plaintiff had a brief  
7 inappropriate extramarital encounter with Jane Doe.  
8 Do you see where I have read?

9 A. Yes, sir.

10 Q. Plaintiff did not sexually assault Jane  
11 Doe, groom her, initiate the encounter, force himself  
12 on her or violently kiss her. Jane Doe initiated the  
13 encounter, the encounter lasted only a few minutes  
14 and involved only some awkward fondling.

15 Do you see where I just read?

16 A. Yes, sir.

17 Q. So here you state that Jane Doe initiated  
18 the encounter. You didn't tell that to Guidepost  
19 investigators though, correct?

20 A. No, sir.

21 Q. You said it lasted only a few minutes. You  
22 didn't tell that to Guidepost investigators, did you?

23 A. Not sure I was given the opportunity.

24 Q. When Ms. Nokes went over the report with  
25 you, and there were a lot of things where you were

1 asked questions and denied what they said, you were  
2 given the opportunity to deny certain statements,  
3 though, correct?

4 A. The denial was in the context of them  
5 talking over me while I had said: This entire  
6 narrative is not right.

7 But you did.

8 It is not right. No, it did not happen  
9 like that. I was staying within a narrative. If the  
10 narrative is wrong, it's not a time to be answering  
11 the questions.

12 Q. Did they say at any point during that  
13 meeting that we don't want to hear from you, we only  
14 want to accuse you?

15 A. No, they didn't have to --

16 MR. MacGILL: Those spoken words?

17 MR. KLEIN: I'm sorry?

18 MR. MacGILL: Spoken words. Did they speak  
19 those words, is that your question?

20 MR. KLEIN: Yes, yes, yes.

21 MR. MacGILL: He's asking you if they spoke  
22 those words to you as he just said.

23 Q. (By Mr. Klein) Did they tell you at any  
24 time that we don't want to hear what you have to say,  
25 we just want to make accusations towards you?

1 A. No, they proved it.

2 Q. They proved it by giving you --

3 A. By the way --

4 Q. Hold on. You can keep going. I'm sorry.

5 A. The way they were overwhelming me,  
6 continual.

7 Q. But they also gave you a chance to answer,  
8 at some point, to acknowledge that you did know that  
9 Jane Doe was coming down, and you did receive a text  
10 of a photo to see that she was in town. Do I have  
11 that right?

12 A. Correct.

13 Q. So they did give you an opportunity to  
14 acknowledge certain details, correct?

15 A. Correct.

16 Q. Do you remember the first time that you  
17 mentioned to anybody -- let me withdraw and ask a  
18 better question.

19 After your second meeting with the  
20 investigators on May 12th, from that moment on, when  
21 was the first time that you mentioned that your  
22 encounter with Jane Doe was consensual?

23 A. To my wife, again.

24 Q. When was that?

25 A. That same day. She was there with me. But

1 I told her that 12 years prior.

2 Q. Let me see here. Mr. Hunt, it seems fair  
3 to say that you have expressed today your frustration  
4 with how that second meeting with the investigators  
5 was handled; fair statement?

6 A. Fair.

7 Q. And it sounds like in particular, some of  
8 your gripes certainly that you have raised a few  
9 times today were the number of meetings they had with  
10 Jane Doe and her husband versus only the two meetings  
11 they had with you, only one of which talked in any  
12 specifics, correct?

13 A. Exactly.

14 Q. And another "gripe" -- my word -- that you  
15 have is that, in your words, they shared -- "they"  
16 being the investigators -- shared drafts of what  
17 ended up in the report with Jane Doe and her husband  
18 but not with you?

19 A. Correct.

20 Q. And you felt both of those things were key  
21 problems for you in how this was handled?

22 A. I really had no way to know what I was  
23 facing. But yet they were clear, crystal clear of  
24 what they were doing and pretty much -- I would love  
25 to see -- maybe one day I will be able to see what's

1 attorneys eyes only. But I would love to know how  
2 they promised them that she would never be exposed  
3 and there would be no repercussions.

4 Q. Do you know whether that even was stated to  
5 them?

6 A. Absolutely.

7 MR. MacGILL: Whoa, whoa, whoa. Counsel,  
8 you can't ask that question. You've withheld  
9 11,000 pages. We say it properly. You can't  
10 ask him these questions. You have withheld  
11 11,000 pages, and now you are asking him what he  
12 knows. You are responsible for his information  
13 deficit here. So move on to your next question.

14 MR. KLEIN: Let me know when you are done  
15 with your speech, okay?

16 MR. MacGILL: We are done with you. We're  
17 going to --

18 MR. KLEIN: Hold on. Don't make it  
19 personal, Rob.

20 MR. MacGILL: It's personal.

21 MR. KLEIN: Don't make it personal.

22 MR. MacGILL: Because it is you that has  
23 decided to withhold, unlawfully, 11,000 pages  
24 and then you come here. You give up 31  
25 interview drafts yesterday afternoon, right?

1           And you dedesignate. Now, if there's a court in  
2           this country that won't sanction you for that, I  
3           want to see it, okay? Now, you make it worse --  
4           and we will make this part of our sanctions  
5           motion -- you make it worse by now questioning  
6           him about what he knows when you have withheld  
7           11,000 pages. So do so at your peril. Ask  
8           whatever you like.

9           MR. KLEIN: I've asked you not to  
10          personally attack me. I think we are trying to  
11          be respectful with each other. For the most  
12          part, you are. You certainly haven't been then.  
13          You certainly can have whatever complaints you  
14          want about how this case has been conducted.  
15          Frankly, we have complaints as well. I would  
16          appreciate the mutual respect that you don't  
17          have to be personal in your attacks. That's all  
18          I'm saying, one. Two, I wasn't asking about  
19          anything from the attorneys eyes only documents.  
20          How can I? Apparently your client hadn't seen  
21          them, if you are honoring the obligation. All I  
22          was asking, in general, in reaction to what he  
23          said is how he knew that.

24          MR. MacGILL: Right.

25          MR. KLEIN: That's all I asked.

1 MR. MacGILL: He can't --

2 MR. KLEIN: The only way he can know it is  
3 not just based on AOE documents. It's based on  
4 his knowledge of this case. So I'm not, of  
5 course, referring to an AEO document. He  
6 wouldn't have seen that document. I'm asking of  
7 his general knowledge and how he knew that. He  
8 could answer 15 different ways. I'm looking for  
9 an answer. And that's all I was doing. I  
10 wasn't pointing to any document.

11 And you are jumping in because you need to  
12 make the point every hour that you believe we  
13 have -- us filing a court order is problematic  
14 to you and your clients. I understand your  
15 position legally, totally understand. I  
16 disagree with your sanctions position on it. We  
17 believe we were following the Court order, but I  
18 understand your position. I am not looking for  
19 that. I don't need you every hour to have this  
20 speech about the 11,000 documents. I was just  
21 asking your client generally, having nothing to  
22 do with the AEO documents. That was my point,  
23 Rob.

24 MR. MacGILL: It has everything to do with  
25 it. Ask your question.



1 MR. KLEIN: I'm going to move on because I  
2 have forgotten the question, which again, seems  
3 to be your goal often. And we will move past it  
4 because I think I've had the answer sufficiently  
5 at the time.

6 MR. MacGILL: You just complain about  
7 personal accusations, don't you, Scott?

8 MR. KLEIN: Rob, I just find it unhelpful.

9 MR. MacGILL: Move on. Move on.

10 MR. BESEN: Guys, I want dinner. I'm  
11 hungry.

12 MR. MacGILL: Move on.

13 MS. NOKES: Amen.

14 MR. MacGILL: Gene is hungry.

15 Q. (By Mr. Klein) Mr. Hunt, I have just  
16 described to you some of the frustration that you had  
17 felt. We talked about the number of meetings and the  
18 shared drafts, correct?

19 A. Yes, sir.

20 Q. If there were only two meetings with the --  
21 with Jane Doe and her husband, the same two meetings  
22 you had, and there were no drafts shared with Jane  
23 Doe and the same report was issued, would you still  
24 be suing the defendants?

25 MR. MacGILL: Object to the form of the

1 question.

2 A. Yes. If they'd said it in one meeting that  
3 I assaulted her, she would -- I would be suing.

4 Q. (By Mr. Klein) So fine. Thank you.

5 You would agree that it was Jane Doe's  
6 allegations that bring us here today, correct?

7 MR. MacGILL: Object to the form of the  
8 question.

9 Q. (By Mr. Klein) You can answer.

10 MR. MacGILL: Calls for a legal analysis.  
11 You can answer.

12 Q. (By Mr. Klein) You can answer.

13 A. Okay. No, I don't believe that. I believe  
14 it's the fact that you-all didn't give me a fair  
15 shake. I feel ripped off by Guidepost.

16 Q. You would agree, though, that if Jane Doe  
17 did not make the allegations that found its way into  
18 the report that you dispute, if she did not make  
19 those allegations, you would have no basis to sue us.  
20 Is that correct?

21 MR. MacGILL: Object to the form of the  
22 question. Calls for a legal conclusion.

23 Q. (By Mr. Klein) You can answer.

24 A. Say that again. I'm sorry.

25 Q. Sure. Sure. Your claim is for defamation,

1 which are false statements. Do you understand that?

2 A. Correct.

3 Q. And would you agree that the false  
4 statements are based on, in part, allegations that  
5 were brought by Jane Doe?

6 A. Correct.

7 Q. That were given by Jane Doe to the  
8 investigators?

9 A. Exactly, yes.

10 Q. Why did you not go forward with a  
11 defamation lawsuit against Jane Doe and her husband  
12 then? Or Jane Doe, I should say, not her husband.

13 MR. MacGILL: Object to the form of the  
14 question. You may not answer as to the legal  
15 advice that you have been given. Any  
16 communications that you had with your lawyers,  
17 you should not repeat. If you have information  
18 separate and apart from the legal advice that  
19 you have secured in this matter, go ahead and  
20 answer, but --

21 Q. (By Mr. Klein) I agree. Yes. I don't want  
22 any of your legal advice. Just on your own. Why did  
23 you choose, on your own, not to commence a lawsuit  
24 against Jane Doe?

25 MR. MacGILL: Same instruction. This is

1 not a backdoor way into the legal advice that we  
2 have given you over time. Do not communicate  
3 any details of the legal advice that we have  
4 given you over time. But if you have answers  
5 separate from the legal advice you have been  
6 provided by counsel, please answer.

7 A. It has not been my desire to do personal  
8 suits. If I were doing personal suits, I would sue  
9 Bart Barber, which has been so proven that he lied in  
10 his tweet with 66,000 responses. To call me a felon,  
11 and he did not call me credibly accused, he called me  
12 an "accused sex abuser." And I have never been  
13 accused. I have never been convicted. I have never  
14 confessed. And he wrote the policy. He violated his  
15 own policy. And so if I were going to go personal,  
16 there's a few more.

17 Q. (By Mr. Klein) I just want to make sure I  
18 understand what you mean by "personal." When you say  
19 "personal," what do you mean, suing an individual?

20 A. Individual.

21 Q. So you made the choice on your part not to  
22 sue any individuals who may have been involved in  
23 this and chose, instead, just to sue the entities?

24 A. Unless before we go to trial, I'm able to  
25 see what my attorneys have seen that I haven't been

1 privileged to, I may be able to read something else  
2 that would change my mind.

3 Q. Fair enough. But at this point, that's the  
4 reason why you chose to proceed the way you have  
5 chosen.

6 A. Yes, sir. Yes, sir. Yes, sir.

7 MR. MacGILL: And, Counsel, just make the  
8 advice -- I know you get unhappy. Once our  
9 client is able to see 11,000 pages, we will make  
10 some decisions, okay? I want you to know that.

11 MR. KLEIN: I am counting on that, Rob.

12 MR. MacGILL: You should. He's not seen  
13 any of the documents from the CEO of your  
14 company at this point. He's been embargoed  
15 information pertaining to the SBC president,  
16 et cetera, et cetera. So he has not had access  
17 to this information. It's been withheld, we  
18 say, inappropriately.

19 Q. (By Mr. Klein) Did you, Mr. Hunt, have any  
20 communications with Jane Doe's attorney at any point?

21 A. Never.

22 Q. Did you ever have any -- I don't think you  
23 have answered this. Did you ever -- since the report  
24 was issued, have you spoken with Jane Doe at all?

25 A. None, no conversation.

1 Q. And with Jane Doe's husband?

2 A. No conversation.

3 Q. Not since the report was issued?

4 A. No.

5 MR. KLEIN: I think I only may just have a  
6 few more questions.

7 The complaint was marked earlier. It's a  
8 very thick document, Rob, if you don't mind  
9 sharing it with your client.

10 MS. NOKES: It's rubber-banded. Maybe  
11 under your binder.

12 MR. MacGILL: There you go.

13 THE WITNESS: Okay.

14 Q. (By Mr. Klein) Let me know when you have it  
15 in front of you, Mr. Hunt.

16 A. I have it.

17 Q. If you can turn to paragraph 8 on Page 2.

18 A. I'm there.

19 Q. First sentence says, On May 22, 2022,  
20 Guidepost, the SBC and its leadership publicly  
21 released a report that purported to focus on whether  
22 the SBC's executive leadership had inappropriately  
23 responded to allegations of child and other sexual  
24 abuse. Do you see where I have read?

25 A. Yes, sir.

1 Q. What evidence do you have that Guidepost,  
2 as opposed to the other defendants, that Guidepost  
3 publicly released the report?

4 MR. MacGILL: Again, Counsel, here we go  
5 again. You've withheld 11,000 pages -- I get to  
6 say it again, because of your question -- 11,000  
7 pages and you want him to answer your question  
8 about what evidence? Well, sir, you have it and  
9 you have embargoed the evidence and he hasn't  
10 seen any of it. So are you going to withdraw  
11 your question?

12 MR. KLEIN: I am absolutely not going to  
13 withdraw my question, but I appreciate you  
14 asking.

15 MR. MacGILL: I figured you would not.  
16 But, again, this is part of the Q&A that we want  
17 to submit to the Court so the Court can see the  
18 prejudice that's associated with what you have  
19 done.

20 All right. Go ahead and answer the  
21 question.

22 Q. (By Mr. Klein) Do you remember the question  
23 before your lawyer's conversation?

24 A. No, sir.

25 Q. I will ask it again.

1 A. Okay. Thank you.

2 Q. I don't want to read the sentence again to  
3 remind you, I read on paragraph 8, Mr. Hunt --

4 A. Yes, sir.

5 Q. -- that first sentence. I won't reread  
6 that into the record.

7 A. Okay.

8 Q. My question, though, is what evidence do  
9 you have that Guidepost publicly released the report  
10 as opposed to the other defendants?

11 A. Right. I felt in this -- again, I'm no IT  
12 person --

13 Q. I understand.

14 A. -- but the fact that you-all did post a  
15 link to the report on your website and I'm sure it  
16 got plenty of activity.

17 Q. Did you ever click on that link?

18 A. Never did.

19 Q. Is that the only basis that you have to  
20 assert that Guidepost publicly released the report,  
21 that link that you are referring to?

22 MR. MacGILL: Again, same objection as  
23 before. There's the embargo of 11,000 pages of  
24 documents makes the witness certainly at least  
25 partially impaired from answering the question.



1 Q. (By Mr. Klein) Well, I am actually asking  
2 about what happened at the time you filed the  
3 complaint, not what happened afterwards when there  
4 was any discovery. At the time of filing the  
5 complaint -- which is all I'm interested in -- at  
6 that time, when you chose to include Guidepost as a  
7 defendant, you just stated that from your  
8 understanding, the public release by Guidepost was  
9 via that link.

10 A. Right.

11 Q. And I'm saying, In addition to that link or  
12 other than that link at the time of filing the  
13 complaint, do you know of any other action that  
14 Guidepost did to publicly release the report?

15 A. Well, I look at it as your report, given to  
16 the SBC. They did not do the work to produce that  
17 document. Guidepost did.

18 Q. I understand that.

19 A. And then when I read that Guidepost has  
20 identified with three exceptions, I personally  
21 believe you violated all three.

22 Q. I don't think that answers my question.  
23 I'm not talking about that.

24 A. Okay.

25 Q. That's fine. I just want to -- I'm going

1 to ask it again.

2 A. Okay.

3 MR. MacGILL: Can he finish his answer on  
4 this one or no?

5 MR. KLEIN: He finished his answer on that.

6 MR. MacGILL: No, he wants to give you the  
7 three reasons that you violated -- that you  
8 violated your legal obligations here, but you  
9 don't want that testimony that he's going to  
10 give you?

11 MR. KLEIN: Rob, I don't think he was going  
12 to give them to me.

13 Q. (By Mr. Klein) Mr. Hunt, if you were going  
14 to give them to me and you remember them, have at it.  
15 I didn't think you were going to, though.

16 A. Yeah. One was -- it was tort. It was  
17 negligent. And that would be my belief, going back  
18 to -- I like the way you put the question. It was  
19 encouraging. A moment ago when you said what if we  
20 had just interviewed them one or two times and you  
21 one or two times, wish to God you-all had been that  
22 fair and treated her and me alike. I'm not sure why  
23 she deserved special treatment and why she's so  
24 believable and I'm not given the opportunity to be  
25 believable. So I see it as very negligent. And I

1 can't remember the third, but I knew I agreed with it  
2 when I read it.

3 Q. I'm going to ask the question again, just  
4 to make sure --

5 A. Okay.

6 Q. -- you and I are on the same page. I just  
7 said, Other than the link that you referred to that  
8 was on our site that you understand ultimately takes  
9 you to the report, other than that, is there any  
10 other basis that you maintain where Guidepost  
11 published the report? Other than that link?

12 A. In my reasoning, it's your report. You've  
13 got to own it.

14 Q. I'm not -- I think maybe we are speaking  
15 past each other. I will try one more time and then I  
16 will move past it.

17 A. Okay.

18 Q. And it's no problem. No fault. I'm not  
19 talking about the ownership of the report. Part of  
20 one of the claims is that we published it to a third  
21 party. It's a legal statement, Rob will object, I  
22 will try explain to you. Sorry.

23 A. All right.

24 Q. One of the requirements is that we publish  
25 to a third party. I'm only trying to understand.

1 You have now stated on the record just now that it's  
2 your understanding that we did that by having this  
3 link on our site that people could click to.

4 A. Right.

5 Q. My question is, other than that -- so  
6 forgetting about who owns the report -- is there  
7 another basis that you believe that we shared the  
8 report with a third party? Just that specific  
9 question. Do you know of anything else that we did?

10 A. Not that I know of. No.

11 Q. And that's fine.

12 A. And that's why I would see the lawsuit  
13 against the Southern Baptist Convention and EC  
14 because they've got to own what they published and  
15 what they took from you.

16 Q. That's fine.

17 MR. KLEIN: Can we take five minutes and I  
18 may be done?

19 MR. MacGILL: Sure. Sure.

20 THE VIDEOGRAPHER: The time is 4:38 p.m. we  
21 are off video record.

22 (WHEREUPON, a recess was taken.)

23 THE VIDEOGRAPHER: We are back on the  
24 record. The time is 4:53 p.m.

25 MR. KLEIN: Mr. Hunt, on behalf of

1 Guidepost Solutions, thank you for your time. I  
2 have no more questions.

3 THE WITNESS: Thank you, sir.

4 MR. MacGILL: Sir, I have got just a few  
5 follow-up questions.

6 EXAMINATION

7 BY MR. MacGILL:

8 Q. One, I would like to just start out on the  
9 subject of texts and emails. First, have you ever  
10 discussed the details of the encounter with  
11 Ms. [REDACTED] in an email with anyone?

12 A. No.

13 Q. Have you ever discussed the details of the  
14 encounter with Ms. [REDACTED] in a text with anyone?

15 A. No.

16 Q. Do you have any emails or texts, sir,  
17 relating to the encounter that you have not produced  
18 to your lawyers in this case?

19 A. I don't know of any.

20 Q. When you testified earlier about emails  
21 that you forward to your wife, Janet, what emails  
22 were you talking about. Do you remember?

23 A. Most of them were the ones where -- was it  
24 CLO sends us and tells us all that is being discussed  
25 among attorneys or what the judge has said or

1 magistrate, that type of information.

2 Q. Okay. Fair enough. Now, I want to cover  
3 one last thing. So you have described to Ms. Nokes  
4 and to counsel for Guidepost a number of things about  
5 the encounter, the subject of a lot of testimony. I  
6 would like to focus on the day after the encounter in  
7 2010.

8 A. Okay.

9 Q. Could you tell the Court and jury what --  
10 when you next saw Ms. [REDACTED] the following day?

11 A. Yeah. First, I was out on a run and I  
12 leave my phone at home. And when I came back,  
13 really, before I came back, my wife drove to where I  
14 was running and confronted me with a text from her.  
15 What is this from [REDACTED] [REDACTED] wanting to go running  
16 with you? And I said, Well, I can answer it right  
17 here. And she can't go running with me. And there  
18 had been no promise or anything of that. She had  
19 just made that request. Plus, she had made a  
20 request -- I think we saw this in a report -- of  
21 wanting to borrow salt and pepper. And so I --  
22 because I told her I was not going back, even though  
23 she had said this is the first day, I said, I'm  
24 leaving. Come and get it from my wife.

25 Q. Come and get what from your wife?

1 A. The salt and pepper.

2 Q. Okay. And then what else happened that  
3 day?

4 A. And then later on, my wife and I and my  
5 children and their husbands were on the beach. And  
6 that's when she came down in her white bikini. And  
7 we are sitting facing the water. She turned her  
8 chair sideways in front of us. And it offended my  
9 wife and children because they know that I know her,  
10 even though she, at that time, didn't know there had  
11 been any -- anything to happen. And so --

12 Q. So what happened next?

13 A. -- when she left the beach, my wife  
14 followed her and met her on the balcony and just  
15 basically said, I want you to get your things in your  
16 room and pack up and leave here. I don't want you to  
17 ever text or email my husband again. Are we clear?  
18 She said, Yes, ma'am. Got her stuff and went home.

19 Q. All right. What happened -- was there any  
20 follow-up or any other -- in connection with these  
21 events, anything else happen?

22 A. It was not until the next day that [REDACTED]  
23 called me and say, Why would your wife ask her to  
24 leave? And I said, Well --

25 Q. Ask who to leave?

1           A.     Ask his wife to leave, ask ██████ to leave.  
2     And I said, Well, you can ask. But he said, yeah,  
3     but you know. And I said, I do. I said, ██████ she  
4     felt that your wife was down here flirting and  
5     preying on me. And that's why she asked her to  
6     leave.

7           Q.     And what did he say?

8           A.     Well, I don't think that was the case. He  
9     pretty much tried to defend his wife. And I said,  
10    Well, you will have to have that conversation with my  
11    wife. She's the one who made the decision. And  
12    we -- we left it there. But then we -- we -- after I  
13    did share with him that next Monday what had  
14    occurred, and then when he came into the room and  
15    said -- and he would be one that testified to saying,  
16    Not only do I forgive you, I beg you not to quit. We  
17    need you. You have helped me. I'm where I am  
18    because of you. And basically when he did leave that  
19    church, the following church -- and they would  
20    testify to this -- pretty much made a commitment to  
21    him predicated on my mentorship, that if I would be  
22    available to help him to progress as a leader in the  
23    church that he went to in -- outside of Dallas,  
24    Georgia. And he stayed there the next eight years.

25          Q.     Okay.



1 MR. MacGILL: Thank you very much. No  
2 further questions here.

3 MR. BESEN: No questions.

4 MR. KLEIN: No questions.

5 MS. NOKES: None.

6 THE VIDEOGRAPHER: Anyone on Zoom?

7 MR. KLEIN: Hearing no response.

8 MR. MacGILL: Okay. We are finished.

9 MR. SANDERS: We would like to reserve  
10 signature.

11 THE VIDEOGRAPHER: The time is 4:58 p.m.  
12 Going off the video record.

13 (Whereupon, the proceedings were concluded  
14 at 4:58 p.m.)

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## 1 COURT REPORTER DISCLOSURE

2

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4 Regulations of the Board of Court Reporting of the  
5 Judicial Council of Georgia, I make the following  
6 disclosure:

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*Robin K. Ferrill*

-----  
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21 Certified Court Reporter

22

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1 C E R T I F I C A T E

2 STATE OF GEORGIA )

3 ) ss.:

4 FULTON COUNTY )

5

6 I, Robin Ferrill, Certified Court Reporter within  
7 the State of Georgia, do hereby certify:

8 That Johnny M. Hunt, the witness whose  
9 deposition is hereinbefore set forth, was duly sworn by  
10 me and that such deposition is a true record of the  
11 testimony given by such witness.

12 I further certify that I am not related to any  
13 of the parties to this action by blood or marriage; and  
14 that I am in no way interested in the outcome of this  
15 matter.

16 IN WITNESS WHEREOF, I have hereunto set my  
17 hand this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

18

19 \_\_\_\_\_ *Robin K. Ferrill* \_\_\_\_\_

20 ROBIN K. FERRILL, RPR

21

22

23

24

25

1 To: Mr. MacGill  
Re: Signature of Deponent Johnny M. Hunt  
2 Date Errata due back at our offices:

3 Greetings:

This deposition has been requested for read and sign by  
4 the deponent. It is the deponent's responsibility to  
review the transcript, noting any changes or corrections  
5 on the attached PDF Errata. The deponent may fill out  
the Errata electronically or print and fill out manually.

6  
Once the Errata is signed by the deponent and notarized,  
7 please mail it to the offices of Magna Legal Services  
(below).

8  
When the signed Errata is returned to us, we will seal  
9 and forward to the taking attorney to file with the  
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12 court without the signature of the deponent.

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1 ERRATA for ASSIGNMENT # 1130260

2 I, the undersigned, do hereby certify that I have read  
3 the transcript of my testimony, and that

4 \_\_\_ There are no changes noted.

5 \_\_\_ The following changes are noted:

6

Pursuant to Rule 30(7)(e) of the Federal Rules of Civil  
7 Procedure and/or OCGA 9-11-30(e), any changes in form or  
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8 shall be entered upon the deposition with a  
statement of the reasons given for making them. To  
9 assist you in making any such corrections, please use  
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10 please furnish same and attach.

11 Page \_\_\_\_\_ Line \_\_\_\_\_ Change \_\_\_\_\_

12 \_\_\_\_\_

13 Reason for change \_\_\_\_\_

14 Page \_\_\_\_\_ Line \_\_\_\_\_ Change \_\_\_\_\_

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16 Page \_\_\_\_\_ Line \_\_\_\_\_ Change \_\_\_\_\_

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20 \_\_\_\_\_  
JOHNNY M. HUNT

21 Sworn to and subscribed before me this \_\_\_ day of

22 \_\_\_\_\_, \_\_\_\_\_.

23 \_\_\_\_\_

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24

25 My Commission Expires: \_\_\_\_\_



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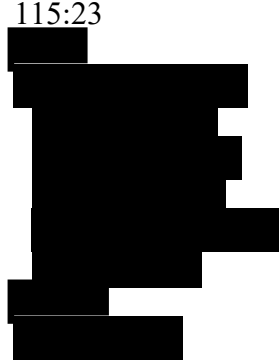


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