

**EXHIBIT B**

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

Will McRaney,

Plaintiff,

v.

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

Defendant.

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

**DECLARATION OF BILL BARKER**

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

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in the foregoing Declaration is based on my personal knowledge of the matters and facts set forth herein.
2. I was a missionary to Appalachia, cooperating with The North American Mission Board of the Southern Baptist Convention, Inc. (NAMB) and the state conventions in the Appalachian Region. The ministry was known as Appalachian Regional Ministry (ARM). I served with NAMB as a missionary from May 1, 2001, through December 31, 2017. ARM was a cooperative ministry of NAMB, the National Woman's Missionary Union (WMU), and thirteen state conventions. From 2001 through 2011, NAMB paid my salary, and the states paid the expenses. In 2012, NAMB picked up the total cost—my salary and the expenses. For my last ten years with NAMB, I also supervised the Mississippi River Ministry (MRM). The ministry consisted of eight state conventions, NAMB, and the WMU.
3. During the time I worked with NAMB, I had many personal interactions with Kevin Ezell and participated in many meetings with Mr. Ezell.
4. Among those meetings were staff meetings, and for a period from the fall of 2012 until September 2015, I participated in NAMB's Senior Leadership meetings. Those meetings were often recorded by video, and on numerous occasions, I personally heard Kevin Ezell instruct Mike Ebert to edit out of the video recordings statements he made during the meeting. Among the statements he would instruct should be edited out of the video were outbursts and negative statements about other people.

5. It was also my firsthand experience of interactions with Mr. Ezell that, on occasions, he made statements and accusations that were false and bullying in nature. As frequently expressed in state meetings, Ezell's attitude was "whatever it takes," which he practiced.
6. In the spring of 2017, a sizable donation of money was made to Clear Creek Baptist Bible College (CCBBC), in Pineville, Kentucky, through ARM. When Mr. Ezell found out about the donation, he became angry, fired off a number of heated text messages (that he continued sending until after midnight), and had the ARM website shutdown. I was told the next morning that Ezell had instructed the IT staff to shut down the website around midnight.
7. My life was made miserable after that in terms of working with NAMB management. I was restricted from working with certain ministries and schools that Ezell did not like (such as CCBBC) and ministries that were loosely connected with the Southern Baptist Convention. As director, seemingly every decision I made was challenged and at least once every 4 to 6 months I was called in for the purpose of dismissal. As a ministry, ARM belonged to the state executive directors, not to NAMB. When I was told by NAMB personnel that I was subject to termination, I called Dr. Robert White, State Executive Director for the Georgia Baptist Convention (GBC). He then called the other state executive directors and then called Ezell telling him to back off.
8. In May 2017, Carlos Ferrer met with me in private and told me that if I called Dr. White again for help after the next attempt to fire me, Ezell said he would fire Carlos Ferrer and Steve Davis in retaliation.
9. After a confrontational meeting in 2017 with David Melber, President of NAMB Send Relief, during which Ezell wanted me fired, I was asked to leave Melber's office when the telephone rang. From outside the office, I could hear Ezell ask Melber if he had fired me (Melber's phone was on speaker). Thus, with the understanding that I was protecting the jobs of two men and what I perceived to be Ezell's insistence, I was forced into early retirement.
10. Even after leaving NAMB and continuing the work of ARM through the Georgia Baptist Mission Board (GBMB), Dr. White told me that either Ezell or Melber would call him frequently, demanding my termination from Appalachian Mountain Ministry, former ARM. One of the first acts of the new-GBMB state executive director, Thomas Hammond, a personal friend of Ezell, was to terminate me from the GBMB.
11. Prior to his death in December 2018, Rev. Ron McCoy, a former pastor in West Virginia, former NAMB Trustee, and former President of the West Virginia Convention of Southern Baptists, called me and wanted a private meeting. McCoy told me he wanted to come clean before dying, and stated to me that I had been the victim of an intentional smear campaign that damaged my reputation and ministry considerably. McCoy told me that Ezell was behind the campaign and then proceeded to name those at NAMB who carried out the smear campaign on Ezell's behalf.
12. From personal experience and knowledge, I know that Kevin Ezell has used NAMB's funding and resources to control state conventions. Following the resignation of Terry L. Harper, State Executive Director for the West Virginia Convention of Southern Baptists (WVCSB) in 2014, I was invited by the search committee to submit my name for consideration as his replacement. After receiving permission from my immediate supervisor, Dr. Steve Davis, then a Vice President with NAMB, I submitted my resume. It was my understanding that Ezell had been consulted and given permission for my name to be put before the committee. The search committee narrowed down the candidates to me, Matt Shamblin, and Bill Henard. Seth Polk,

chairman of the committee and pastor of Cross Lanes Baptist Church, Cross Lanes, West Virginia, was told by Kevin Ezell that if the WVCSB chose Bill Henard, NAMB would contribute \$200,000 over the next two years towards Henard's salary package (this was reflected in the state-published budget report). However, all NAMB funding would be terminated if they chose someone else. Similar reports have emerged from the Michigan Convention and other state conventions in the Southern Baptist Convention. Needless to say, Bill Henard was chosen in 2015 as the new WVCSB Executive Director.

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

Executed on February 22, 2023

A handwritten signature in cursive script, appearing to read "Bill Henard", is written over a horizontal line.