

EXHIBIT G

TRANSCRIPT

OF LYELL AND

MOHLER

In Re: Phone Call with Jennifer Lyell

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P R O C E E D I N G S

DR. MOHLER: Hello.

MR. GEIGER:: Dr. Mohler?

DR. MOHLER: Yes.

MR. GEIGER:: Okay. This is Eric Geiger.

DR. MOHLER: Eric. Yes. I was expecting
your call.

MR. GEIGER:: Okay. I am going to call
Jennifer here in a little bit. She's not at the office.
She left and went to go see her counselor after she told
me this morning. And so she's expecting me to call her
in here in a second.

DR. MOHLER: Okay. I have Adam Greenway,
who's the dean of the Graham School here with me, so I
need not to hear this alone.

MR. GEIGER:: Okay. I think that's great.
And she -- she -- just so you know, we only heard this
this morning, so we just -- I just found out --

DR. MOHLER: Yes.

MR. GEIGER: -- about 9:00 o'clock this
morning. Okay. So I'm going to go ahead and call her
in.

DR. MOHLER: Thank you. Thank you, Eric.

MR. GEIGER: Okay. Everybody should be on

1 now. Is everybody here?

2 MS. LYELL: Yes.

3 DR. MOHLER: I'm here.

4 MR. GEIGER:: Okay. Dr. Mohler, I'm going
5 to go ahead and let Jennifer share what she shared with
6 me this morning --

7 DR. MOHLER: Please.

8 MR. GEIGER:: -- and then --

9 MS. LYELL: Dr. Mohler, (inaudible) Dr.
10 (inaudible) shared some information. I got it
11 (inaudible) read it, but I sent to Eric, but (inaudible)
12 I think it kind of just breaks my heart and then I'm glad
13 to answer any questions you have.

14 Dr. (inaudible) was talking about past history, my
15 relationship with Dr. Sills. All of this is history. I
16 severed the relationship two years ago and contact so
17 this is all in the past, but when -- while (inaudible)

18 Here's my statement. Here is what I've written and
19 (inaudible) my heart. To be clear, I was responsible for
20 as much as him in relationship. Specifically, the
21 idolatry of family and of a father (inaudible). And as
22 (inaudible) probably conflicted -- inflicted here, that
23 it felt to me like he was trying to be a dad to me. And
24 there were times whenever he overtly, especially in the

1 beginning was (inaudible) after that. But that was
2 something that was intrinsically -- but then I also felt
3 that something was intrinsically wrong with me and with
4 making those things happen, those things being sexual
5 acts.

6 I worked hard to try ways to prevent it and to change
7 the dynamic. I started doing ministry stuff for him to
8 try to stop it. I eventually moved away from Louisville
9 to try to stop it, but I still couldn't let go of the
10 dream and the illusion of a family for a long time and I
11 (inaudible) of that. I always knew what he was
12 (inaudible) and cared, but I never ever wanted it that
13 way. I promise before God that I say that, (inaudible)
14 before God.

15 I did, however, spit on him (inaudible). I did
16 generally physically and verbally resist and sometimes
17 that would be submission. Other times, I gave in and
18 complied because I didn't want him to be upset with me or
19 make him feel bad if I didn't care about him. I care
20 about family. So I do think I have responsibility
21 (inaudible) before God in response to that and I also
22 confess it's a sin and it's wrong, but I repented, set
23 with my pastor in the past to talk to him about this and
24 ask him and (inaudible) to make sure that my heart was

1 fully right before God. So I did (inaudible). I did --
2 I did participate in sexual (inaudible) but with
3 (inaudible) was sometimes under physical force.

4 I was however able to eject myself from the situation
5 in the relationship with the help of a guidance
6 counselor, which came a couple years ago. It just took
7 me a long time to figure that out. Along the way, I had
8 to keep up the family relationship and really just
9 focusing on that and so that was the only dynamic and I
10 didn't think about the other except when it was happening
11 and just tried to avoid it.

12 I loved his family very, very much and I loved him in
13 the context of family relationship I had. I know I loved
14 his wife, his children, his grandchildren and I haven't
15 disclosed this to them because I wanted to prevent the
16 hurt from them. That's the whole reason that I never
17 disclosed (inaudible) because I knew -- I didn't want to
18 hurt them and I couldn't figure out how to make it stop
19 without disclosing to them and I got (inaudible) I
20 couldn't find a way.

21 I am so sorry -- I'm so sorry, Dr. Mohler. I know
22 that I'm sure you've got other things to do today.
23 (inaudible) I'm so sorry, Dr. Mohler.

24 DR. MOHLER: Jennifer --

1 MS. LYELL: (inaudible) I'd also like you to
2 know that I do not -- I have no -- (inaudible) I
3 understand, and I said to Eric earlier, I assume that
4 some girls that in situations like this, (inaudible)
5 can't figure out how to get out and so they go to the
6 institution and they report and they ask for help.
7 That's not this. I got out of it (inaudible).

8 DR. MOHLER: Yes.

9 MS. LYELL: So I thought -- I don't -- I
10 have no -- I have -- and I understand (inaudible) I mean
11 I will sign something. I have no animosity towards
12 Southern. I have no animosity towards them. I have
13 grief. And I wish and pray for God to be merciful and
14 God to be merciful through you (inaudible) because I
15 wasn't --

16 DR. MOHLER: Yes.

17 MS. LYELL: -- I don't want more (inaudible)
18 to be hurt. I want you to know that this is not public.
19 There's nothing here except a desire to tell the truth
20 and to have integrity and to respond (inaudible)

21 DR. MOHLER: Yes.

22 MS. LYELL: -- (inaudible) the church. So
23 but --

24 DR. MOHLER: Jennifer, God bless you. I'm

1 so sorry you even had to share that and it breaks my
2 heart, first of all. It breaks my heart for you. It
3 breaks my heart for all those who you care about and you
4 just talked about, especially in David's family. It
5 angers me beyond what I can articulate, but just know
6 that I'm very concerned for you, praying for you. We
7 stand behind you and we will, I am determined, will do
8 the right thing here with broken hearts and so that --
9 that -- that's what I've got to turn to now.

10 I need to ask you a couple of questions if -- can
11 you hear me?

12 MS. LYELL: Yes, I can hear (inaudible)

13 DR. MOHLER: Okay.

14 MS. LYELL: I couldn't hear you for a second
15 but I can hear you know.

16 DR. MOHLER: Okay. Are there legal actions
17 that you need to take to protect yourself, that you
18 should take?

19 MS. LYELL: No, sir.

20 DR. MOHLER: Okay.

21 MS. LYELL: No, sir. I don't feel the need
22 to do that when -- nor do I feel called to do that and I
23 don't -- there -- I don't think it would be wise. I'm
24 confident that there are not legal things that I should

1 take and I'm confident that there will not be any at any
2 point in the future. That's not in my heart.

3 DR. MOHLER: Yeah. Well, I just need to
4 make sure that you know that you would have our
5 encouragement to go to whatever law enforcement
6 authorities and -- and -- that would be rightful. I also
7 want to ask you and I -- honestly, I've not had to deal
8 with this kind of situation before for which I'm very
9 thankful. But I do want to ask you just so I know -- I
10 think I know what we need to do but I want to ask you
11 what you think I should do.

12 MS. LYELL: Gosh.

13 DR. MOHLER: I'm not putting this on you. I
14 just want to carefully ask.

15 MS. LYELL: No. I know. I appreciate that.
16 You know Eric is -- if I would talk to you or if I wanted
17 to talk (inaudible) your staff. I don't know how well
18 you remember me or I -- I remember you enough to know
19 that you're not super great with names. So but I -- I
20 have -- I have always appreciated your leadership and I
21 trust your leadership and so I -- I would say first of
22 all, Dr. Mohler, how I would want you to handle this is I
23 want you to pray about and it do what you think is best
24 for Southern and for the kingdom. I want you to know

1 that this is -- this is not something I would ever go
2 public with and that's because I -- there's nothing to be
3 gained from going public with it. So there's -- but so
4 to me I think that gives you the freedom to do what --

5 DR. MOHLER: Yes.

6 MS. LYELL: -- you think is best before God
7 and that --

8 DR. MOHLER: Yes.

9 MS. LYELL: That's what my hope and prayer
10 is. Honestly it's hard for me to say what that is
11 because I have a lot of emotion tied into this.

12 DR. MOHLER: Sure.

13 MS. LYELL: I really, really, really loved
14 his family and --

15 DR. MOHLER: Sure.

16 MS. LYELL: -- I do think that although
17 probably what my counselor would say or probably my
18 pastor who I've talked with about this would say I might
19 be (inaudible). I did come out of a very broken past. I
20 had a lot of abuse as a child and I don't think that that
21 excuses the situation and I can look back now and see
22 things really clearly to show there was intent. But I do
23 know that I didn't say anything for like a decade and I
24 kept showing up at the house and kept being a part of the

1 family even while that was going on so I do -- I bear
2 responsibility and I -- you should also know that the
3 whole time this was going on he would -- he would always
4 afterwards verbally express that, you know, he was sorry
5 and that that should happen, that that's not who he
6 wanted to be. So I -- I would want whatever happens to
7 cultivate (inaudible) in him.

8 DR. MOHLER: Yes.

9 MS. LYELL: I do think, sir, that over the
10 past two years whenever I had some kind of ultimatum type
11 conversations of "leave me alone" and "don't contact me"
12 and "find a way to explain that to your family or else I
13 will have -- I will disclose." It didn't seem to bear a
14 sobriety so I don't know how he views -- I just know the
15 level of brokenness I've had over it and I don't -- I
16 don't feel like I saw that in him.

17 DR. MOHLER: Yes.

18 MS. LYELL: Because (inaudible)

19 DR. MOHLER: Yes.

20 MS. LYELL: (inaudible) I don't know if
21 that's helpful. I'm sorry.

22 DR. MOHLER: No, and again, I wasn't -- I
23 didn't mean to put anything on you to make a judgement,
24 but to hear from you if you had one. I -- I have just

1 one additional question I have to ask given our process
2 and that is I am going to confront him with this. That
3 is my first responsibility here. I need to know if --

4 MS. LYELL: You can tell him it came from
5 me. That I disclosed.

6 DR. MOHLER: Yes. And if it should come to
7 this and he should demand a face-to-face accusation, is
8 that something you would be willing to do? I -- I
9 honestly don't think it would be necessary. I just have
10 to ask so when I go into the conversation.

11 MS. LYELL: Yes. No. I understand and yes,
12 I would be willing to -- I'm willing to always help the
13 church.

14 DR. MOHLER: Yes.

15 MS. LYELL: So I mean I would also ask
16 (inaudible) but I do think acknowledging that I -- I
17 realize. Like I really did place my idolatry for family
18 and this was confusion and not -- there was just a lot of
19 emotional aspects for me that are not the same as sexual
20 misconduct and all those things. But I -- I just know
21 that I -- I'm not acting as though I was (inaudible). I
22 mean I --

23 DR. MOHLER: I hear that. I hear that. I
24 hear that consistently, Jennifer. I need to ask you one

1 other question unrelated to --

2 MS. LYELL: Yes, sir.

3 DR. MOHLER: -- the conversation with David.
4 I just -- I just want to make sure that right now are you
5 in a place where you're safe and you have people around
6 you --

7 MS. LYELL: Yes, sir.

8 DR. MOHLER: -- that can support you. Okay.
9 Just know that we love and support you, Jennifer, and I
10 know how painful this had to be. It's painful just to
11 hear. I can't imagine how painful it was to say. And --

12 MS. LYELL: (inaudible) Dr. Mohler. I know
13 that -- I know that you love Southern and I know that
14 this hurts your heart too in different ways and I love
15 Southern too and so I just want you to know I'm sorry for
16 that too, so.

17 DR. MOHLER: Well, I hear that and I want
18 you to know we will want to handle this in a way that
19 would make you even more proud of Southern and I pledge
20 that to you.

21 MS. LYELL: Thank you so much, sir. And if
22 there's anything else you all need, just let me know. I
23 just -- I just --

24 DR. MOHLER: I certainly will.

1 MS. LYELL: -- appreciate (inaudible) please
2 be just all I want is what God wants, so that's all.

3 DR. MOHLER: Well, we will join you in that.
4 God bless you, Jennifer.

5 MS. LYELL: Thank you.

6 DR. MOHLER: We will be praying for you.
7 You know that.

8 MS. LYELL: Thank you. Thank you, sir.
9 Have a good day.

10 DR. MOHLER: Bye. Thank you.

11 MR. GEIGER: Dr. Mohler, I would like to
12 talk with you for a moment after Jennifer gets off if I
13 can.

14 MS. LYELL: Okay. I'm going to hang up,
15 Eric.

16 MR. GEIGER: Thank you, Jennifer.

17 MS. LYELL: Okay.

18 MR. GEIGER: Dr. Mohler, are you still
19 there?

20 DR. MOHLER: I'm here.

21 MR. GEIGER: Thank you. Thank you for
22 handling it so graciously. Dr. (inaudible) said that's
23 exactly what he thought would happen which I'm -- I'm
24 really -- I'm really grateful for. I -- I mean it's just

1 painful to have to see -- to see one of your members --

2 DR. MOHLER: Right.

3 MR. GEIGER: She's on my team. You know, go
4 through it. For us, I'm going to -- I'm going to go
5 ahead and, you know, start the process with our team of
6 taking it to the resources (inaudible). The reason I
7 feel like I need to do it at the same speed that I've had
8 to do several others in the last couple of --

9 DR. MOHLER: Right.

10 MR. GEIGER: -- months (inaudible)

11 DR. MOHLER: Right.

12 MR. GEIGER: And so but I don't want to --
13 because of our relationship I don't want to get ahead of
14 the game here. We're not going to go public with any
15 kind of thing (inaudible) it would all be just preparing
16 for (inaudible) So --

17 DR. MOHLER: Yeah. I -- I -- I have Adam,
18 his dean, here with me.

19 MR. GREENWAY: Yeah. I -- hello, Eric.
20 Sorry we're having to discuss under these circumstances.
21 I think obviously our first intention is to talk with
22 David face-to-face though I think he's overseas right now
23 because they had that IMB meeting over in Bangkok and I
24 don't know if he's back in country yet. So --

1 DR. MOHLER: So that's crucial. So I -- I
2 will have to find out when we can confront him, Eric.

3 MR. GREENWAY: Yep.

4 MR. GEIGER: Okay. Got it.

5 DR. MOHLER: If he --

6 MR. GEIGER: Okay. Well, we're -- we will --
7 -- we won't have --

8 MR. GREENWAY: Because the --

9 MR. GEIGER: -- anything go out until after
10 that happens.

11 MR. GREENWAY: Yeah. Because it would
12 trigger something here if -- if an edict came -- came
13 down for (inaudible) to start pulling resources, well, of
14 course his resources are prominently in the campus
15 bookstore. That would trigger questions that we're
16 probably not in a position to try to adjudicate before --

17 MR. GEIGER: Right (inaudible) we don't
18 ever. We don't do that. It doesn't happen quite
19 (inaudible) what you're saying.

20 MR. GREENWAY: Okay. That's --

21 MR. GEIGER: Yeah. You've got 172 stores,
22 you know. We don't have associates pulling stuff as much
23 as being sure that we're not printing more copies, you
24 know --

1 DR. MOHLER: Yeah.

2 MR. GEIGER: And all the -- all the places
3 that we're going to have to sever. Unfortunately, we've
4 actually learned through all this to have a checklist on
5 all the stuff that has to be done so people --

6 DR. MOHLER: Sure.

7 MR. GEIGER: -- can have faith in
8 checklists. But it's --

9 DR. MOHLER: Sure.

10 MR. GEIGER: I will -- I would love to draft
11 behind you guys and not be ahead of you guys so --

12 DR. MOHLER: We will stay in touch with you,
13 Eric. Adam's going to have to as quickly as possible
14 figure out where David is and how quickly we can --

15 MR. GREENWAY: Get him here.

16 DR. MOHLER: -- meet with him.

17 MR. GREENWAY: Yeah.

18 DR. MOHLER: And I've learned in these
19 situations that I want the advantage of an ambush.

20 MR. GREENWAY: Yep.

21 MR. GEIGER: Yep.

22 DR. MOHLER: People tend to be most honest
23 when they're unexpectantly confronted with an accusation.

24 MR. GEIGER: Yes. I've found the same.

1 DR. MOHLER: My heart breaks for --

2 MR. GEIGER: (cross talk)

3 DR. MOHLER: My heart breaks for Jennifer in
4 every way. I'm thankful you guys are there for her. I
5 trust you and obviously trust Tom so you guys please keep
6 me informed and I will keep you informed.

7 MR. GEIGER: Yes. We will do that. Thanks
8 for the time.

9 DR. MOHLER: All right. God bless you,
10 Eric. Bye.

11 MR. GEIGER Bye.
12
13

14 ***CALL ENDED***

REPORTER'S CERTIFICATE

STATE OF WEST VIRGINIA,
COUNTY OF KANAWHA, to-wit:

I, Shawna Hyde Meeks, Notary Public within and for the State of West Virginia, duly commissioned and qualified, do hereby certify that the foregoing interview was transcribed by me, under the West Virginia Rules of Civil Procedure. I do certify that this is, to the best of my knowledge and belief, a true and correct transcript of the interview given by said witness, and meets the requirements set forth within article 27, chapter 47 of the West Virginia Code.

I further certify that I am not connected by blood or marriage with any of the parties to this action, am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, or financially interested in the action, or interested, directly or indirectly, in the matter in controversy.

Given under my hand this 29th day of July, 2024.

My commission expires March 15, 2025.

Shawna Hyde Meeks, CCR

Notary Public