

**BEFORE THE BOARD OF BISHOPS  
CHURCH OF GOD IN CHRIST, IN  
CHAIRMAN, BISHOP JOHN H. SHEARD**

**IN RE BISHOP KURT THOMPSON (CASE NO. 2020-KT-0831)**

**STATEMENT OF ALLEGED VIOLATION**

**PROCEDURAL HISTORY**

1. On or about February 25, 2020, Bishop William H. Watson, III, Secretary of the Board of Bishops, received a complaint from Elder Dae'r L. Kyles and Elder Roland Fitzgerald (collectively "Complainants") against Bishop Kurt Thompson, Auxiliary Bishop and Interim Bishop of Texas Southeast First Jurisdiction ("Respondent") alleging that Respondent: (a) Count I -- failed to abide by the rules and regulations of the Church of God in Christ when he did not issue a Notice of Dismissal following a decision by the Texas Southeast First Jurisdictional Pastors and Elders' Council that there was insufficient evidence to warrant a trial of Pastor (formerly Bishop) Rufus Kyles, Jr. (Article VIII, §D, ¶1(a)); (b) Count II – engaged in malfeasance by placing three additional stipulations or restrictions on Pastor Rufus Kyles, Jr. preventing his return to the pastorate of Evangelist Temple Church of God in Christ ("Evangelist Temple") (Article VIII, §D, ¶1(b)); (c) Count III – engaged in conduct unbecoming a bishop by showing a clear bias against and hostility toward members of Evangelist Temple (Article VIII, §D, ¶1(h)); and Count IV – willfully or maliciously failed to make an account and report of Evangelist Temple funds (Article VIII, §D, ¶1(f)) ("Complaint").<sup>1</sup>

2. On or about March 5, 2020, Bishop Watson informed that Complainants by letter that the initial Complaint failed to conform with the Board of Bishops Rules of Process and Procedure pleading requirements, as the initial Complaint did not contain the requisite affirmations and signatures. In that email communication, Bishop Watson also provided Complainants with copies of the relevant rules.

3. On May 26, 2020, one of the Complainants, Elder Dae'r L. Kyles, contacted the Board of Bishops seeking to know the status of their Complaint and attaching a copy of the initial Complaint ("Resubmitted Complaint"). The Resubmitted Complaint suffered from the same defects as the original version filed in February 2020.

4. On that same day, Bishop Watson responded to Elder Dae'r L. Kyles' email inquiry informing him that the initial Complaint (and the Resubmitted Complaint) were both deficient, as

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<sup>1</sup> The Complainants attached six exhibits to the Amended Complaint which were reviewed and considered by the Grievance Committee. Exhibit 6 is a copy of an earlier separate complaint filed by a different party against Respondent (Complaint No. 2018-KT-0906). This earlier complaint was withdrawn by the complaining parties and dismissed by the Board of Bishops. As such, the allegation made in that earlier complaint (set forth in Complaint exhibit 6) will not be considered by the Grievance Committee in reviewing the instant Complaint).

neither version aligned with the Board of Bishops' Rules of Process and Procedure pleading requirements. He stated that matter could not advance unless and until the pleading requirements were met.

5. No other official communication occurred between the Board of Bishops and the Complainants until August 21, 2020 when Bishop Watson emailed them to ascertain whether they intended to pursue the Complaint.

6. The Complainants responded on August 23, 2020 and submitted a conforming complaint with the necessary affirmations ("Amended Complaint"). The substance of the Amended Complaint, however, did not change.

7. On or about August 31, 2020, pursuant to Rules of Process and Procedure No. 4(a), First Vice Chairman, Bishop Albert Galbraith, Second Vice Chairman, Bishop Roger Jones, and Secretary, Bishop William H. Watson, III ("Initial Review Committee") confirmed that the Amended Complaint complied with the Rules and Process and Procedure.

8. On or about September 15, 2020, the Initial Review Committee provided written notice to the parties that the Amended Complaint was being forwarded to the Grievance Committee to make a just cause determination.

9. Generally, Complainants assert in their statement of facts that Respondent, while serving as Interim Jurisdictional Bishop of Texas Southeast First and pastor of Evangelist Temple, treated the flock harshly having temper tantrums and exhibiting behavior that disqualifies him as a bishop.

10. The detailed charges set forth in the Amended Complaint are as follows. With respect to Count I, Complainants assert that Respondent mishandled the jurisdictional charges advanced against Pastor Rufus Kyles, Jr. in Texas Southeast First Jurisdiction. Complainants cite to Article VIII, §B, ¶2(c) (Trials of Pastors of Local Churches) which requires that if the "Investigating Committee ... reports that the charges are without merit the trial shall be dismissed by the Jurisdictional Bishop, and notice of the dismissal *shall* be sent to all interested parties including the General Secretary (emphasis added)".

11. The Complainants allege that the Texas Southeast First Jurisdiction Investigating Committee ("Jurisdictional Investigatory Committee") which reviewed the jurisdictional charges against Pastor Rufus Kyles, Jr. found that the evidence was not strong enough to warrant a trial against him. As such, Complainants allege that Respondent failed to send a "[n]otice of dismissal as required by Article VIII."

12. With respect to Count II, claiming malfeasance under Article VIII, §D, ¶1(b), Complainants allege that Respondent "of his own accord" placed additional stipulations or restrictions on Pastor Rufus Kyles, Jr. preventing his return to the pulpit of Evangelist Temple in Houston, Texas. They allege that since the aforementioned disciplinary charges against Pastor Rufus Kyles, Jr. were dismissed by the Jurisdictional Investigatory Committee, "all chains of

discipline and shackles of stipulations must fall to the ground.” The Complainants assert that Respondent’s actions were arbitrary and unlawful constituting an act of malfeasance. [cite]

13. With respect to Count III, claiming that Respondent engaged in conduct unbecoming of a bishop in violation of Article VIII, §D, ¶1(h), Complainants allege that during a January 29, 2020 meeting Respondent exhibited bias against and hostility towards the members of Evangelist Temple when he threatened to have a member removed by two men, one of whom was in possession of a firearm.

14. With respect to Count IV, claiming that Respondent willfully or maliciously failed to make an account and report of the funds of the church in violation of Article VIII, §D, ¶1(f), Complainants’ claim that Respondent failed to give an account of the funds of Evangelist Temple and that the longstanding accounts of the church have been emptied and closed. They allege that the failure to provide the accounting was done maliciously.

15. In further support of Count IV, Complainants allege that Respondent ignored request from members of Evangelist Temple to give an accounting of the church funds. Complainants attached two exhibits related to this issue to the Amended Complaint: Amended Complaint Exhibit 3 (notes prepared by Attorney Ysidra Kyles regarding the January 29, 2020 Evangelist Temple meeting and the history of the “Kyles Matter”), and Amended Complaint Exhibit 4 (an email communication from Complainant, Elder Dae’r L. Kyles, to Respondent requesting an accounting).

16. On or about September 23, 2020, Respondent submitted his response to the Amended Complaint. He stated generally the following:

- (a) That he was appointed Interim Jurisdictional Prelate of Texas Southeast First in January 2018 by the Presiding Bishop and members of the General Board (attaching a copy of the letter of notification to the Jurisdiction signed by then Presiding Bishop Charles E. Blake);
- (b) That Respondent has been called to the Evangelist Temple on numerous occasions to settle disputes, which required Respondent to seek the assistance of local law enforcement (attaching a copy of a November 3, 2019 Police Report); and
- (c) That Elder Dae’r L. Kyles and Pastor Rufus Kyles, Jr. removed the hinges of the doors of Evangelist Temple. The response noted that Elder Dae’r L. Kyles is the son of Pastor Rufus Kyles, Jr. and one of the Complainants.

17. In response to Count I, Respondent alleges that while the Jurisdictional Investigatory Committee did report on some charges, the Jurisdictional Investigatory Committee had not concluded its work. Respondent states further that he informed Pastor Rufus Kyles, Jr. that the underlying suspension about which he is concerned “was not imposed or enforced by the Jurisdiction and that he needed to consult with the General Board for further action.” ]

18. Respondent claimed that as of the date of his response filing, Pastor Rufus Kyles, Jr. had not consulted with the General Board.

19. In response to Count II, Respondent alleges that *he* did not attempt to impose any additional sanctions on Pastor Rufus Kyles, Jr. other than what had been imposed by the General Board.

20. Instead, according to Respondent, that after a discussion between the Evangelist Temple Advisory Board and Pastor Rufus Kyles, Jr. , the Advisory Board recommended that Pastor Rufus Kyles, Jr.:

- (a) take a minimum of 8 counseling sessions with a certified counselor and bring back a certificate of completion;
- (b) either disband the church he started (Great Commandment Church) or bring it into the Church of God In Christ and allow the Jurisdictional Prelate to appoint a Pastor (even if it were him);
- (c) could not move the Evangelist Temple Church out of Texas Southeast First Jurisdiction; and
- (d) would remain under the supervision of the Jurisdictional Bishop for two (2) years, with the understanding that any additional occurrence would justify removal from Pastorate.

Respondent claimed that these additional stipulations or restrictions were not promulgated by him, but that they came from the 85% of the Evangelist Temple membership. The Evangelist Temple Advisory Board submitted a signed letter to the Grievance Committee, which Respondent attached as Response Exhibit D to his response.

21. In response to count III, Respondent admits that he has had one person arrested for terroristic threats – Moses Tyson. Respondent denies that he has ever intimidated, berated, or threatened any member of Evangelist Temple. Respondent states that the person alleged to have had a firearm at Evangelist Temple is employed by the Harris County Constable's Office. In support of this allegation, Respondent attached a copy of Christopher Edwards' Deputy Badge for Precinct One of Harris County Constable's Office.

22. In response to Count IV, Respondent states that he does not handle the finances or daily operations of Evangelist Temple and that he appointed an administrative pastor, Elder Terrance Kirk, to manage the church. Respondent attached Pastor Kirk's September 17, 2020 letter addressed to the Grievance Committee claiming he has provided an Annual Report to the Evangelist Temple members each year since 2017.

23. Respondent states that the Complainants are not members of Evangelist Temple, that neither of them regularly attends services, consistently gives, or attends church meetings. According to Respondent, Complainant left Evangelist Temple when Pastor Rufus Kyles, Jr. formed the Great Commandment Church, a congregation that is not under the auspices of the Church of God in Christ.

24. Respondent further states in response to Count IV that the COGIC Constitution prohibits membership in more than one church. In other words, Respondent is claiming that the Complainants cannot be members of Evangelist Temple since they are members of the Great Commandment Church, and since Complainants are not members of Evangelist Temple, they are not entitled to have an accounting and therefore lack standing to make this claim.

25. Relatedly, Respondent alleges that Complainant Elder Dae'r L. Kyles regularly represents himself to law enforcement as the Chairman of the Trustee Board. Respondent asserts, however, that Elder Dae'r L. Kyle's appointment as Evangelist Temple Trustee Board Chairman is invalid because it was made by Pastor Rufus Kyles, Jr. after the General Board revoked Pastor Rufus Kyles, Jr.'s ability to make such appointments in its order of suspension.

26. Finally, Respondent claims that Complainants are using this process to retaliate against him because Pastor Rufus Kyles, Jr. has been unable to reclaim his leadership role at Evangelist Temple.

27. On October 4, 2020, Complainants, by and through their attorney Ysidra M. Kyles filed the First Addendum to Complainants' Petition of Official Charges ("First Addendum"). The First Addendum added Counts V and VI, alleging that Respondent: (a) Count V – engaged in malfeasance by seeking a Temporary Restraining Order from the civil courts (Article VIII, §D, ¶1(b)); and (b) Count VI – engaged in malfeasance by seeking an expedited hearing for a ruling with respect to the Temporary Restraining Order (Article VIII, §D, ¶1(b)).<sup>2</sup>

28. With respect to Count V, Complainants allege that Respondent's committed malfeasance by filing a lawsuit in Harris County, Texas state court on July 24, 2020, Case No. 2020-44106/Court: 133 ("Texas Civil Lawsuit"). In the Texas Civil Lawsuit, Respondent requested and was granted a Temporary Restraining Order against Pastor Rufus Kyles, Jr. Complainants contend that the lawsuit was improper because there were no ecclesiastical charges pending against Pastor Rufus Kyles, Jr.

29. Complainants cite to Article IV, §A, ¶3 of the COGIC Constitution in support of their claim that an interim auxiliary bishop has no authority to initiate civil legal actions.

30. With respect to Count VI, Complainants make a separate allegation of malfeasance arising out of Respondent's attorney request for an expedited temporary injunction hearing in the

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<sup>2</sup> Rule of Process and Procedure No. No. 3(f) provides that "[a] Complaint may not be amended without leave of the Board of Bishops. Otherwise, any new allegations of improper conduct must be submitted in a new Complaint that independently meets the procedural requirements of the Rules of the Board of Bishops." Such leave was neither requested nor given. Technically, the Complainants should have been required to submit the First Addendum as a new complaint and the Complainants should have been required to verify the allegations. If the Grievance Committee was going to recommend a trial on the counts set forth in the First Addendum, the Board of Bishops would need to resolve whether the Grievance Committee had the jurisdiction to consider these claims. Since the allegations made in the First Addendum are inextricably tied to the claims made in the Amended Complaint, the Grievance Committee considered them anyway, as a matter of efficiency. Since Respondent did not object when the First Addendum was filed, he has effectively waived his right to challenge the Grievance Committee's consideration of these claims.

Texas Civil Lawsuit. A copy of Plaintiff's Request for Expedited Temporary Injunction Hearing attached hereto as Exhibit A.

31. On October 26, 2020, the Grievance Committee requested that the Respondent respond to the First Addendum.

32. On November 02, 2020, Respondent filed his response to Complainants' First Addendum.

33. In response to Count V, Respondent admits that he filed the Texas Civil Lawsuit and requested a Temporary Restraining Order against Pastor Rufus Kyles, Jr. Respondent claims that Pastor Rufus Kyles, Jr. and Elder Dae'r L. Kyles' actions (removing the hinges from the Evangelist Temple doors) necessitated the lawsuit in order to maintain the status quo. In support of his response, Respondent produced a video showing the Kyles removing the door.

34. Respondent alleges that there were other confrontations at the church, and that Elder Dae'r L. Kyles' threatened to bring guns to the church. Respondent claims that because he thought harm might be eminent, he filed the lawsuit and sought a Temporary Restraining Order to protect individuals and the property.

35. In response to Count VI, Respondent states that the General Board has sought to resolve Pastor Rufus Kyles, Jr. ' suspension. Respondent alleges that Pastor Rufus Kyles, Jr. has reneged on the verbal agreements with the General Board. According to Respondent, the Texas Civil Lawsuit "have become necessary to prevent Pastor Rufus Kyles, Jr. and members of his family from continuing to disrupt the services at Evangelist Temple Church."

36. Respondent states further that the instant Complaint is being brought against him in retaliation for fulfilling his obligations to adhere to the directives of the General Board and enforcing the suspension imposed on Pastor Rufus Kyles, Jr. And, Respondent asserts that the Complainants are not current COGIC credential holders and should not be able to overrule the desires of the credentialed pastors of Texas Southeast First Jurisdiction.

37. On November 17, 2020, Respondent submitted an additional response to the First Addendum ("Supplemental Response"). He states: (a) he felt the request for a Temporary Restraining Order was "necessary after having a conversation with Elder Dae'r L. Kyles and then with officers of the church in which threats of harm were indicated; and (b) that the allegation that Elder Dae'r L. Kyles is or has been the Chairman of Trustee Board of Evangelist Temple is not accurate. Respondent provided statements and attachments from Anne McQueen-Benson and Evangelist Missionary Denise Dean, respectively to support his claim that Elder Dae'r L. Kyles is not the Chairman of the Board of Trustees of Evangelist Temple.

### **GRIEVANCE COMMITTEE INVESTIGATION**

38. In addition to reviewing the Complaint, Amended Complaint, First Addendum, the related exhibits, and the respective responses submitted by Bishop Kurt Thompson, the Grievance Committee performed its obligations under the Rules of Process and Procedure and investigated

the Complaint to determine whether to recommend to the Board of Bishops' Judicial Committee that just cause exist to hold this matter over for trial.

#### **INVESTIGATION REGARDING JURISDICTIONAL CHARGES AGAINST PASTOR RUFUS KYLES, JR.**

39. The Grievance Committee reviewed the minutes of the January 29, 2020 Evangelist Temple meeting where it appears that Bishop Thompson presided. The minutes show that Respondent explicitly stated that "the Investigative Committee reported . . . there was not enough evidence to warrant a trial". The minutes also indicate that Respondent "had been served an appeal [of the jurisdictional matter] to the Judiciary Board." A copy of the minutes is attached hereto as Exhibit B.<sup>3</sup>

40. The record indicates that at some point around the January 29, 2020 time period, at least some of the Evangelist Temple members appealed the Jurisdictional Investigatory Committee's decision that there was insufficient evidence to warrant a trial to the Church of God in Christ Judiciary Board ("Judiciary Board").

41. The Grievance Committee, however, was never provided and never obtained a copy of the appeal.

42. The Grievance Committee, however, obtained a copy of the Judiciary Board's May 11, 2020 Order in which it rejected the Evangelist Temple members' request for reconsideration of the Jurisdictional Investigatory Committee's finding of insufficient evidence. A copy of the May 11 Judiciary Board Order is attached hereto as Exhibit C. The Judiciary Board determined that: (a) the constitutional procedures for filing a Petition for reconsideration and adjudication had not been followed; (b) the substantive issues set forth in the Petition were not constitutionally appropriate for the Judiciary Board; and (c) the substantive issues in the Petition might evolve into that may be later considered by the Judiciary Board and thus were not ripe, because the Petitioners had not exhausted its judicial remedies.

43. On November 7, 2020 the Evangelist Temple members submitted additional information to the Judiciary Board in support of their request for reconsideration of the Jurisdictional Investigatory Committee's finding that there was insufficient evidence to warrant a trial for Pastor Rufus Kyles, Jr.

44. On December 21, 2020, Respondent sent a letter to the Evangelist Temple members acknowledging that he had received the members' request for reconsideration of the charges against Pastor Rufus Kyles, Jr. In that communication, Respondent stated that he believed in accordance with COGIC Constitution Article VIII, §B, ¶2(b) that he was to appoint a new committee to investigate the new allegations ("Second Jurisdictional Investigatory Committee"). The Grievance Committee was not provided a copy of this request for reconsideration.

45. On February 25, 2021 Elder Calvin Blake and Chairman Elder James G. Strolger of the Texas Southeast First Jurisdiction Council of Pastors and Elders issued a letter, presumably

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<sup>3</sup> The Grievance Committee's investigation did not uncover who actually authored the January 9<sup>th</sup> meeting minutes. Therefore, it is not possible to apply an objective evaluation of their credibility.

as a result of the Respondent's formulation of the Second Jurisdictional Investigatory Committee, setting the new matter for trial for Monday, March 29, 2021.

46. The Texas Southeast First Jurisdiction Pastors and Elders Council did, in fact, conduct a trial on March 29, 2021, and determined that Pastor Rufus Kyles, Jr. was guilty of the charges that were presented to them. The Grievance Committee is informed that Pastor Rufus Kyles, Jr. did not appear at the trial to defend himself against the charges.

#### **INVESTIGATION REGARDING ACCOUNTING AND PASTOR RUFUS KYLES JR.'S COMPENSATION**

47. In support of their claim that Respondent has not given a proper accounting of the funds of Evangelist Temple, the Complainants provided the Grievance Committee a document setting forth the estimated monies that Pastor Rufus Kyles, Jr. believes he is owed by Evangelist Temple.

48. In the course of the investigation, the Grievance Committee obtained a copy of Evangelist Temple's 2018 through 2020 Financial Reports. The 2018 through 2020 Evangelist Temple Financial Reports attached hereto as Exhibit D.

49. The Grievance Committee also obtained from Pastor Rufus Kyles, Jr. a document in which he sets forth the amounts he believes he is owed from both Evangelist Temple and Texas Southeast First Jurisdiction. Pastor Rufus Kyles, Jr. Financial Document attached hereto as Exhibit E.

50. There were multiple communications emanating from the Presiding Bishop and the General Board concerning Pastor Rufus Kyles, Jr.'s suspension and any compensation to which he is entitled.

51. First, on November 17, 2015 following Pastor Rufus Kyles, Jr.'s first trial before the Board of Bishops, the General Board set forth the initial terms of his pastoral suspension in a letter directed to the Evangelist Temple Board of Trustees and its membership. This November 2015 suspension letter specifically states in paragraph three that Pastor Rufus Kyles, Jr. would not receive any compensation from Evangelist Temple "until a recommendation regarding his compensation is made by the membership of Evangelist Temple and such recommendation is approved by the General Board." A copy of the General Board November 17, 2015 letter is attached hereto as Exhibit F.

52. Second, on June 2, 2016, likely because of the order from the Judiciary Board requiring a retrial of Pastor Rufus Kyles, Jr. before the Board of Bishop, the General Board revised the language in paragraph three of the suspension letter and stated that Pastor Rufus Kyles, Jr. would "continue to receive compensation based on the recommendation of the membership of Evangelist Temple, approved by the General Board." A copy of the General Board June 2, 2016 letter is attached hereto as Exhibit G.

53. What is not made clear and the Grievance Committee has not been able to ascertain is what the phrase "continue to receive compensation" means in this context. The Grievance



Committee has no information on whether Evangelist Temple ever made a recommendation for compensation. If Evangelist Temple ever made such a recommendation, how much compensation did it recommend? And, to the extent the membership of Evangelist Temple made a compensation recommendation of any amount, did the General Board ever approve the recommended amount?

54. Finally, the November 19, 2019 letter from Bishop Blake to Pastor Rufus Kyles, Jr. confirming that his suspension from his role as the pastor of Evangelist Temple continues is silent as to his compensation. A copy of the General Board November 19, 2019 letter is attached hereto as Exhibit H.

#### **INVESTIGATION REGARDING PASTOR RUFUS KYLES, JR.'S SUSPENSION & THE CIVIL LAWSUIT**

55. Statement of Alleged Violation Exhibits F, G, and H also address the additional terms of Pastor Rufus Kyles Jr.'s suspension and the Grievance Committee considered them with regards to this aspect of the investigation.

56. On June 16, 2020, Respondent sent a letter to Evangelist Temple members inviting them to a meeting to ascertain their wishes concerning whether they would like to retain Pastor Rufus Kyles, Jr. as their Pastor. Respondent committed to share whatever their recommendation might be with the General Board.

57. On July 1, 2020, Respondent wrote Pastor Rufus Kyles, Jr. and reiterated that his suspension was not imposed by the Texas Southeast Jurisdiction but was instituted and enforced by the General Board. He encouraged Pastor Rufus Kyles, Jr. to consult with the General Board for future action.

58. On July 24, 2020, Respondent filed the Texas Civil Lawsuit seeking a Temporary Restraining Order against Pastor Rufus Kyles, Jr. because he and one of the Complainants allegedly went to Evangelist Temple to remove the doors of the church. The state court issued a Temporary Restraining Order & Order for Hearing for Preliminary Injunction. The hearing for the temporary injunction was set for August 4, 2020 at 3:00 pm.

59. The Grievance Committee obtained a copy of an August 12, 2020 letter from Bishop Talbert Swan, in his capacity as Assistant General Secretary and Scribe of the General Board, addressed to Respondent confirming that General Board's suspension of Pastor Rufus Kyles, Jr. from his position as pastor of Evangelist Temple was still in place. There is no mention of Pastor Rufus Kyle, Jr.'s compensation in that letter.

60. On March 3, 2021, Pastor Rufus Kyles, Jr. wrote a letter to Bishop Sedgwick Daniels, Secretary of the General Board. His letter included a chronology of the relevant events (from his perspective) related to his suspension imposed by the General Board and requested that the suspension be lifted. A copy of Pastor Rufus Kyles, Jr.'s March 3, 2021 letter is attached as Exhibit I.

61. On March 4, 2021, the Grievance Committee requested that Bishop Sedgwick Daniels provide "any information that the General Board or the Presiding Bishops [sic] has in their

possess that would describe what, if any, instructions or directives were given by the General Board and/or the Presiding Bishop to Bishop Thompson when he was assigned to be Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction.”

62. The next day, the Grievance Committee sent a letter to Respondent requesting similar information.

63. On March 16, 2021, Bishop Sedgwick Daniels responded to the Grievance Committee’s request for information with a DocuSigned letter, in which he detailed Respondent’s assignment as Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction, and Respondent’s relationship with Evangelist Temple. Bishop Daniels confirmed that the General Board “appointed Bishop Thompson to serve as interim bishop of Texas Southeast First until a new bishop is assigned to the jurisdiction.” A copy of the Bishop Sedgwick Daniels’ March 16, 2020 Letter is attached hereto as Exhibit J.

64. Bishop Daniels confirmed that as of the date of that letter Pastor Rufus Kyles, Jr. remains under suspension by the General Board and that Bishop Thompson “acting under the direction of the General Board, was never instructed by the General Board to release [Pastor] Kyles from suspension.”

65. The Grievance Committee pursuant to the Rules of Process and Procedure No. 6 has considered the evidence before it, has determined by a majority of its members that there is just cause to believe that as to certain counts there is just cause to believe that a violation of the Official Manual, or law, rule, regulation or other stand of conduct applicable to the performance of the official duties or the discharge of official responsibilities by a Member of the Board of Bishops.

**COUNT ONE**  
**FAILURE TO ABIDE BY COGIC RULES AND REGULATIONS**  
**(Article VIII, Section D, ¶1(a))**

66. The Grievance Committee incorporates the preceding paragraphs 1 through 66 by reference.

67. Complainants allege that Respondent has mishandled the jurisdictional complaint against Pastor Rufus Kyles, Jr. filed by Evangelist Temple. The crux of the charge is that once the Jurisdictional Investigatory Committee determined that there was insufficient evidence for a trial Respondent was obligated to send a Notice of Dismissal to all interested parties.

68. All parties agree that in January 2020 the Jurisdictional Investigatory Committee found that there was insufficient evidence to warrant a trial – at least for some of the jurisdictional charges.

69. Respondent’s only defense to the fact that he did not issue a Notice of Dismissal is that the Jurisdictional Investigatory Committee’s recommendation did not relate to all of the jurisdictional charges against Pastor Rufus Kyles, Jr. and that the case had not actually concluded.

70. Respondent, however, produced no evidence to establish his proposition that the entire matter against Bishop Kyles had not concluded with the January 2020 decision of the Jurisdictional Investigatory Committee. Nor does he describe in any manner the nature of the remaining charges which were not affected by the decision of the Jurisdictional Investigatory Committee.

71. It does appear based upon the minutes from the January 29, 2020 meeting (and the subsequent ruling by the Judiciary Board) that some members of Evangelist Temple appealed the findings of the Jurisdictional Investigatory Committee. But the record is also clear that in May 2020 the Judiciary Board rejected the appeal.

72. Even if the Grievance Committee were to agree that Respondent's obligation to issue a Notice of Dismissal was stayed until after the Judiciary Board made its ruling, once the Judiciary Board determined that it would not entertain the appeal in May 2020, Respondent should have issued a Notice of Dismissal immediately.

73. Other than Respondent's claim that the jurisdictional case had not concluded in January 2020, he never explains why he did not issue the Notice of Dismissal following the May 2020 decision of the Judiciary Board. What happened between May and November 2020? There was plenty of time for Respondent to issue such a Notice of Dismissal as required by Article VIII, §B, ¶2 and he never did.

74. The Grievance Committee appreciates Respondents possible confusion under the circumstances. It appears that at least some of the members of Evangelist Temple continued to press their claim with the Judiciary Board. On November 7, 2020, Evangelist Temple members submitted additional information to the Judiciary Board in support of their request for reconsideration of the Jurisdictional Investigatory Committee's finding that there was insufficient evidence to warrant a trial for Pastor Rufus Kyles, Jr. But there is no indication of what context this filing was made. The Judiciary Board had already rejected the appeal and the November 2, 2020 submission was long after Respondent had a duty to file a Notice of Dismissal.

75. More importantly, Respondent never explains how the Evangelist Temple members' attempted appeal abrogated his responsibilities under the COGIC Constitution. He offers no theory to suggest why he was not obligated under Article VIII, §B, ¶2(c) to issue a Notice of Dismissal.

76. The matter is complicated because it appears that at least some of the Evangelist Temple members may have filed a subsequent complaint against Pastor Rufus Kyles, Jr. arising from new allegations of misconduct in addition to requesting reconsideration of their original complaint. The record is not clear.

77. The Jurisdictional Pastors and Elders Council issued a notice for a trial and that the trial did occur on March 29, 2021. It is unclear whether this new trial arose from a request for reconsideration of the initial charges against Pastor Rufus Kyles, Jr. or if the trial was a result of new charges and facts for which there has not been any previous adjudication.

78. The nature and substance of the second trial is not before the Grievance Committee. The Grievance Committee is only considering Respondent's obligations after the Jurisdictional Investigatory Committee found no basis for a trial in January 2020.

79. What we do know is that had Respondent issued the Notice of Dismissal following the January 2020 decision of the Jurisdictional Investigatory Committee that there was no basis for trial, as required by Article VIII, §B, or had Respondent issued a Notice of Dismissal following the Judiciary Board's May 2020 determination that they would not hear an appeal, much of the confusion regarding Pastor Rufus Kyles, Jr.'s role at Evangelist Temple might have been resolved. Additionally, Complainants would not have had a claim that Respondent failed to abide by the rules and regulations of the church.

80. These rules exist for a reason. They provide certainty, continuity, and fairness. If a Notice of Dismissal had been issued, it would have then been incumbent upon the General Board to immediately determine Pastor Rufus Kyles Jr.'s pastoral future in this church rather than have this lingering dispute plague the church.

81. Under these circumstances, such a decision is exclusively within the Presiding Bishop and General Board's control. Under the provisions of the General Assembly's 2020 Resolution Regarding Sexual Misconduct, the Presiding Bishop and the General Board have the authority and responsibility to protect the church. As such, they could have crafted whatever remedy they deemed appropriate under the circumstances – including leaving Pastor Rufus Kyles, Jr.'s suspension in place notwithstanding the decision of the Jurisdictional Investigatory Committee or the Judiciary Board.

82. But Respondent did not follow the Church of God in Christ rules and regulations in this regard. He did not adhere to his obligation that Article VIII, §B, ¶2(c) clearly spells out.

83. WHEREFORE, the Grievance Committee finds that there is just cause to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(a) of the COGIC Constitution by failing to adhere to or abide by the rules and regulations of this church requiring the issuance of Notice of Dismissal following the Jurisdictional Investigatory Committee determination that just cause did not exist to have a trial of Pastor Rufus Kyles, Jr.

**COUNT TWO**  
**MALFEASANCE**  
**(Article VIII, Section D, ¶1(b))**

84. The Grievance Committee incorporates the preceding paragraphs 1 through 84 by reference.

85. Complainants allege that Respondent committed malfeasance by placing additional stipulations on Pastor Rufus Kyles, Jr.'s ability to return to the Evangelist Temple Church of God in Christ pulpit.

86. The Complaint defines malfeasance to mean “evil doing; ill conduct” and further define malfeasance as “the commission of some act which is positively unlawful; the doing of an act which is wholly wrongful and unlawful . . . .”

87. The evil doing or ill conduct that Complainants allege on the part of Respondent is that he imposed three additional stipulations on Pastor Rufus Kyles, Jr.’s return to the pulpit of Evangelist Temple.

88. Respondent denies that he placed additional stipulations or restrictions on Pastor Rufus Kyles, Jr. He states that the primary suspension imposed on Pastor Rufus Kyles, Jr. by the General Board was ongoing, that he lacked authority to remove it, and that additional stipulations referenced by Complainants were recommended and imposed by the Evangelist Temple membership as a condition to his return, and not by Respondent.

89. Respondent also states that he had sent a letter to Pastor Rufus Kyles, Jr. reminding him that the suspension was not imposed by the jurisdiction, but by the General Board. Respondent attached a copy of the letter to the response and is attached hereto as Exhibit K.

90. The Grievance Committee acknowledges that at the core of this entire dispute is the suspension that the General Board imposed on Pastor Rufus Kyles, Jr. after he was removed from the bishopric; first, by a trial of his peers and then, second after his admission of sexual misconduct pursuant to Rule 7(c) of the Rules of Process and Procedure.<sup>4</sup> As Exhibits F, G, and H to this Statement of Alleged Violations show, the General Board suspension prevented him from leading the Evangelist Temple congregation as the pastor.

91. Because of the salacious details of the underlying claims against Pastor Rufus Kyles, Jr. and the impact of the numerous cases surrounding the circumstances, it is hard to imagine a perfect process given this uncharted territory. Pastor Rufus Kyles Jr.’s admitted behavior resulted in turmoil at Evangelist Temple and in the Texas Southeast First jurisdiction.

92. The alleged inappropriate stipulations or restrictions identified by Complainants as a basis for this Count II were promulgated by Evangelist Temple. Apparently, they were trying to make sure their voices were heard. And even if one were to conclude that these additional stipulations were procedurally inappropriate, the substance of these stipulations or restrictions are not dramatically different from the stipulations imposed by the General Board.

93. At the end of the day, the General Board has not lifted its suspension and these additional stipulations imposed by Evangelist Temple are not inconsistent with the restrictions that the General Board has placed on him. The Grievance Committee agrees with Respondent that he had no authority to lift the suspension imposed by the General Board. Thus, Pastor Rufus Kyles, Jr. has not suffered any additional harm or hardship as a result of the stipulations the members of Evangelist Temple have attempted to impose.

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<sup>4</sup> While the charges against Pastor Rufus Kyles, Jr. are the backdrop for the Amended Complaint and provide context for this dispute, this Amended Complaint should not become the avenue by which the charges against Pastor Rufus Kyles, Jr. can be relitigated.

94. Moreover, we cannot disregard the precarious position that Respondent was in when the leadership of Evangelist Temple insisted on seeking relief from the Judiciary Board and as they continued to pursue charges against Pastor Rufus Kyles, Jr. There is no constitutional roadmap for this circumstance.

95. While the Grievance Committee agrees that Respondent had an obligation to issue a Notice of Dismissal as set forth in Count I, managing these remaining aspects of Pastor Rufus Kyles Jr.'s suspension is not clear.

96. So, any claims against Respondent based on these additional stipulations or restrictions are without merit and would only be relevant if the General Board had lifted its suspension and then Respondent attempted to enforce Evangelist Temple's restrictions notwithstanding.

97. As such, we cannot find a reason to recommend a trial of Respondent on this Count II as we have not uncovered any facts to suggest that Respondent engaged in evil doing or acted with ill intent, as the definition of malfeasance that Complainants offered requires.

98. WHEREFORE, the Grievance Committee finds that just cause does not exist to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(b) of the COGIC Constitution by engaging in malfeasance by placing three additional stipulations on Pastor Rufus Kyles, Jr. limiting his ability to return to the pulpit of Evangelist Temple Church of God in Christ.

### **COUNT THREE CONDUCT UNBECOMING A BISHOP (Article VIII, Section D, ¶1(h))**

99. The Grievance Committee incorporates the preceding paragraphs 1 through 99 by reference.

100. Complainants allege that Respondent engaged in conduct unbecoming a bishop by showing a clear bias and hostility toward members of Evangelist Temple (Article VIII, §D, ¶1(h)).

101. The Grievance Committee has received and reviewed all of the pleadings and facts with regards to this Count III and have determined that there is insufficient evidence to warrant a trial on this Count.

102. The Grievance Committee, of course, agrees that there is a level of decorum that must always be exhibited by members of the bishopric. And, of course, peace is a paramount quality required of those of us who adhere to holiness. *See* Romans 12:18 and Hebrews 11:14.

103. But the Grievance Committee also recognizes that in a situation where there is already turmoil, uncertainty, and disagreement, the perception of how leadership responds will

always be at issue. Nothing that has been alleged regarding Respondent suggests that his behavior has been beyond the pale.

104. The Grievance Committee notes further that it has in other cases refused to issue a Statement of Alleged Violation and recommend a trial where the alleged conduct of the responding party is arguably more egregious.

105. WHEREFORE, the Grievance Committee finds that just cause does not exist to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(h) of the COGIC Constitution by showing a clear bias and hostility toward members of Evangelist Temple (Article VIII, §D, ¶1(h)).

#### **COUNT FOUR**

#### **WILLFUL OR MALICIOUS FAILURE TO MAKE ACCOUNT OF FUNDS**

#### **(Article VIII, Section D, ¶1(f))**

106. The Grievance Committee incorporates the preceding paragraphs 1 through 106 by reference.

107. The Complainants allege that Respondent willfully or maliciously failed to make an account and report of Evangelist Temple funds.<sup>5</sup> Complainants assert that Respondent's failure to provide an accounting and report of Evangelist Temple's was malicious.

108. The Complainant attached as Exhibit 3 to the Amended Complaint, Attorney Ysidra Kyles' February 12, 2020 email communication to Respondent detailing her view of the January 29, 2020 meeting. Paragraphs 1 and 2 set forth of Ms. Kyles' concerns as it relates to Respondent's obligation to give an accounting for jurisdictional finances.

109. The Complaint also attached as an Exhibit 4 to the Amended Complaint a February 7, 2020 written request directed to Respondent and Administrative Pastor Terrance Kirk from Complainant, Elder Dae'r L. Kyles, seeking to obtain accounting for Evangelist Temple's 2019 and the three prior years.

110. In the first paragraph of her email, Ms. Kyles complains that someone removed her from the jurisdictional Wells Fargo Account without notice. She says that at the time she was removed her father was still the Jurisdictional Bishop of Texas Southeast. In her email, Ms. Kyles "request[ed] all transactions from January 2015 until the date that" she was removed."

111. Interestingly, Ms. Kyles admits that her removal occurred when her father was still the jurisdictional prelate. It is very possible that he removed her. Nothing in the Amended Complaint or in her email communication sites to any provision which indicates that she had a

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<sup>5</sup> If Count IV were a stand-alone charge, it would not be properly before the Board of Bishops because the Rules of Process and Procedure require that a complaint brought against a bishop in his capacity as a pastor be brought by a majority of the members of the congregation. A majority of the members did not bring this charge. However, because this count, is one of several that are properly before the Board of Bishops and it relates to facts that are properly considered by the Board of Bishops, it is being considered by the Grievance Committee.

right to be a signer on the jurisdictional account. She does not provide any allegation or evidence that her removal from the account was in any way improper. She just assumes her right to be on the account.

112. Of course, there is family animus associated with Pastor Rufus Kyles, Jr.'s removal from the bishopric. We understand that. But the Grievance Committee is not going to create a divine right of the former Jurisdictional Prelate's family to have access to jurisdictional funds. One would have to plead more to advance a cause of action based on removing Ms. Kyles from the account. Moreover, the Amended Complaint Count IV only makes a claim regarding Evangelist Temple finances.

113. Complaint Exhibit 4 is directed toward the finances of Evangelist Temple. In that email communication, Elder Dae'r L. Kyles writes in his capacity as the purported chairman of the Evangelist Temple Trustee Board and requests that Respondent and Elder Terence Kirk provide him information regarding all financial activities from 2019 to the present and information for the prior three years as well.

114. In support of their claims, the Complainants also produced a document prepared by Pastor Rufus Kyles, Jr. or prepared on his behalf (*See* Exhibit E) which contains his detailed statement of monies he believes he is due from both the jurisdiction and Evangelist Temple.

115. If one reads the Complaint and the attached exhibits closely it seems that the real issue being raised by the Complainants is not that there has not been an accounting, but that Pastor Rufus Kyles, Jr. has not received compensation from Evangelist Temple (and also Texas Southeast First). No one doubts that Pastor Rufus Kyles, Jr. has a sincere belief that he has been deprived of his income.

116. In response to this Count IV, Respondent contends that the Complainants are not members of Evangelist Temple and thus lack standing, so to speak, to complain about the failure to provide an accounting, at least as relates to Evangelist Temple.

117. Respondent states further that to the extent there was a failure with respect to appropriate accounting or reporting, the failure was neither willful nor malicious.

118. Respondent answers the Amended Complaint stating that the administrative pastor, Terrance Kirk, provided an accounting each year since 2017.

119. The Grievance Committee obtained at least three financial documents prepared by Pastor Kirk – 2018, 2019 and 2020.

120. The Grievance Committee finds that the manner in which the Respondent handled the finances of this historic congregation is the most troubling aspect of this case. The financial reports are woefully inadequate, as they do not describe the amounts of money that existed prior to Respondent's tenure and how much money exists today. Respondent also fails to provide any clarification with regards to how Pastor Rufus Kyles, Jr.'s compensation was handled.



121. It is not at all clear based upon the letters reviewed by the Grievance Committee, whether the General Board approved that Pastor Rufus Kyles, Jr. continue to receive compensation from Evangelist Temple. Did Evangelist Temple membership recommend that Pastor Rufus Kyles Jr. receive compensation? If so, how much? Did the General Board approve the compensation if such was recommended by Evangelist Temple?

122. Respondent should have been careful to ensure that all of this was clarified and every dime accounted for. Otherwise it appears that the money of both the jurisdiction and Evangelist Temple may have been mishandled.

123. As an Interim Jurisdictional Bishop, the buck stops with him. Whatever financial decisions were made, even if they were not malicious, they were likely willful. It is not enough to hide behind the “administrative” pastor.

124. Given the nature of the underlying dispute, and the level of acrimony involved, Respondent should have made certain that the financial status and records of both the jurisdiction and the local assembly was absolutely clear and above reproach. There was not enough transparency and now the Grievance Committee is forced to recommend a trail to ferret out the financial status of the church and the jurisdiction to ensure that everything is in compliance with the COGIC Constitution, rules and regulations and the civil law where the jurisdiction and the church exists.

125. The only way to determine whether the money was properly reported and accounted for is to present the facts before an objective body to review them and decide if whether there was any impropriety.

126. WHEREFORE, the Grievance Committee finds that just cause exists to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(h) of the COGIC Constitution by willfully or maliciously failing to make an account and report regarding Evangelist Temple funds.

**COUNT FIVE**  
**MALFEASANCE**  
**(Article VIII, Section D, ¶1(b))**

127. The Grievance Committee incorporates by preceding paragraphs 1 through 126 by reference.

128. Complainants allege that Respondent’s committed malfeasance by filing a lawsuit on July 24, 2020 in which Respondent requested and was granted a Temporary Restraining Order against Pastor Rufus Kyles, Jr. “against whom there are no charges”.

129. The fact that there “were no charges” against Pastor Rufus Kyles, Jr. is a red-herring. Whether the Jurisdictional Investigatory Committee had determined that the evidence is lacking to have a trial does not alter the fact that Pastor Rufus Kyles, Jr. and one of the Complainants had gone to the church to remove the hinges from the doors. The video provided by

Respondent shows Pastor Rufus Kyles, Jr. and Complainant, Elder Dae'r L. Kyles skulking in the church before damaging church property. Rather than having an altercation, Respondent made the reasonable and responsible choice of seeking assistance from the objective civil authorities.

130. Even if the original charges should have been dismissed, it appears that Respondent subjectively believed, even if wrongly, that the renewed charges brought by Evangelist Temple. and his duties as interim jurisdictional bishop required him to protect the church.

131. And most importantly, it does not change the fact that the General Board had not lifted the suspension against Pastor Rufus Kyles, Jr. – a suspension that Respondent was duty bound to enforce.

132. These facts are not the kind that would warrant a trial on a claim of malfeasance.

133. Complainants citation to Article IV, §A, ¶3 of the COGIC Constitution for the proposition that Interim Jurisdictional Bishops do not have constitutional authority to bring civil legal actions is misplaced.

134. Complainants are patently wrong in terms of their understanding of the COGIC Constitution and the authority of an Interim Jurisdictional Bishop appointed by the General Board. First, the language of Article IV does not address the role of an interim bishop in any way. The absence of any language related to a role of interim bishop does not mean that someone placed in that position does not have authority to make decisions.

135. The understanding of Grievance Committee is that an interim jurisdictional bishop stands in the place of the General Board until such time as a permanent jurisdictional bishop is appointed by the General Board and approved by the General Assembly. The language cited by the Complainants does not prohibit such appointments. And the absence of language related to interim jurisdictional bishops does not mean that the position is thus prohibited.

136. One might argue that it would be best for the General Assembly to spell out the role and authority of an interim jurisdictional bishop. That does not mean that these actions constitute malfeasance. While one may argue that it is not wise for an interim jurisdictional Bishop to seek the assistance of secular judicial assistance, we cannot say as a matter of COGIC polity that such action constitutes malfeasance, particularly when there is a long history of such appointments in the church. In fact, one might argue that is precisely in these seasons of uncertainty that secular judicial assistance is necessary.

137. A trial on this Count would be irresponsible on the part of the Board of Bishops, particularly when the role is not spelled out in the COGIC Constitution and there have not been in Judiciary Board rulings regarding the role of an interim bishop. With this uncertainty and the risk of being accused of misbehavior, fewer people will agree to take on such responsibility if their actions to protect the church and its assets contained the risk that they would be disciplined for doing so.

138. Moreover, given the notoriety surrounding the underlying facts associated with the ecclesiastical litigation involving Pastor Rufus Kyles, Jr. , this not the case in which the Grievance Committee would recommend a trial to determine the standard for when it is appropriate for an interim bishop to seek secular judicial assistance.

139. Finally, it is worth noting that there was at least some justification for Respondent bringing the Texas Civil Lawsuit. An objective civil court after hearing evidence and applying the high standards required for granting a temporary restraining order – particularly in the context of a religious dispute where courts are loathed to intervene – is in the best position to evaluate the behavior of Elder Dae'r L. Kyles and Pastor Rufus Kyles, Jr.. We now know that a civil court decided that it was inappropriate for the defendants in the Texas Civil Lawsuit to remove the hinges from the doors of the church. Having that information is in the best interest of the Board of Bishops and the church in general.

140. WHEREFORE, the Grievance Committee finds that just cause does not exist to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(b) of the COGIC Constitution by committing malfeasance by filing a lawsuit on July 24, 220 in which he requested and was granted a Temporary Restraining Order against Pastor Rufus Kyles, Jr. .

**COUNT SIX**  
**MALFEASANCE**  
**(Article VIII, Section D, ¶1(b))**

141. The Grievance Committee incorporates the preceding paragraphs 1 through 141 by reference.

142. Complainants alleged that Respondent also engaged in malfeasance by seeking an expedited hearing with regards to the Temporary Restraining Order.

143. Respondent denies the claim.

144. The Grievance Committee has reviewed the facts and allegations with respect to this Count and conclude that it is merely a restatement of Count V but attacks the fact that Respondent ask for an expedited hearing.

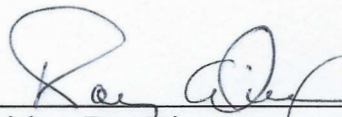
145. Complainants' argument is counterintuitive. They want the Board of Bishops to try Respondent because he attempted to bring a swift resolution to the Texas Civil Lawsuit. It seems they would have wanted a court to rule on the validity of Respondent's claim as quickly as possible, particularly if they thought the claim was not justified.

146. The Grievance Committee acknowledges Respondent's belief that this Complaint is an act of retaliation by Pastor Rufus Kyles, Jr.'s family. While the Grievance Committee cannot speak to Complainants' motives, and the Grievance Committee has determined that there are issues that should be tried, i.e., Counts I and IV, matters involving Pastor Rufus Kyles Jr.'s leadership roles have plagued the Board of Bishops for nearly seven years. We understand the hurt and disappointment that Pastor Rufus Kyles, Jr., and his family may feel. But the COGIC Constitutional disciplinary process cannot be the forum for retribution when persons do not receive the outcome they desire.

147. WHEREFORE, the Grievance Committee finds that just cause does not exist to believe that Bishop Kurt Thompson, Auxiliary Bishop and Interim Jurisdictional Prelate of Texas Southeast First Jurisdiction has violated Article VIII, §D, ¶1(b) of the COGIC Constitution by committing malfeasance by filing a lawsuit on July 24, 2020 in which he requested and was granted a Temporary Restraining Order against Pastor Rufus Kyles, Jr.

Dated: April 15, 2021

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Roy Dixon", is written over a horizontal line.

Bishop Roy Dixon  
Committee Chairman

Cause No. 2020-44106

EVANGELIST TEMPLE	§	IN THE 133 <sup>RD</sup> DISTRICT COURT
CHURCH OF GOD IN CHRIST	§	
PLAINTIFF,	§	
	§	
VS.	§	
	§	
RUFUS KYLES,	§	
DEFENDANT	§	OF HARRIS COUNTY, TEXAS

**PLAINTIFF'S REQUEST FOR EXPEDITED TEMPORAR INJUNCTION HEARING**

COMES NOW, PETITIONER EVANGELIST TEMPLE CHURCH OF GOD IN CHRIST (COGIC) by and thru its Counsel of record, Lonnie L Johnson and files this its Request for Expedited Temporary Injunction hearing. In support thereof, Plaintiffs submits the following:

Plaintiff filed a TRO in this case because Defendant had moved from making threats to take possession to actual actions such as trying to take the doors off the hinges and chaining the doors. The TRO was granted and the parties were informed that they had to conduct a mediation before the Temporary Injunction would be heard by this Court. Realizing that the mediation could not be scheduled before the scheduled hearing date, Counsel for Plaintiff for the Plaintiff contacted the Court and misunderstood that a request was needed to extend the TRO until after the mediation could be completed. Counsel for Plaintiff thought the TRO would be extended until after mediation on the Courts own motion. This was the mistake of Plaintiff's counsel.

The Parties proceeded to mediation and the case did not settle. Since that time, the Defendant has taken note that the TRO has expired and has, in concert with others

<b>EXHIBIT</b> <b>A</b>
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resumed efforts to take over the church. Over the past weeks since mediation, Houston Police has been called to the church on numerous occasions do to actions orchestrated by defendant, such as having a locksmith come to the church to change the locks on the church. The confrontations with the church members and those acting in concert with the Defendant have escalated to the level of reported physical contact.

**There is a very real likelihood that this weekend will produce more confrontation unless the Court intervenes.**

Therefore, Plaintiff in the case hereby request and emergency hearing on the Temporary Injunction presently before this Court, or in the alternative, that this Court reinstate the TRO in this matter until such time as the Court can hear the Temporary Injunction.

Respectfully Submitted,

/s/ Lonnie L. Johnson  
Lonnie L. Johnson  
9800 Northwest Freeway suite 600  
Houston, TX 77092  
202-489-2781 (cell)  
713.864.9981 Fax  
Email: LLJOHNS79@gmail.com

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of Petitioner/Plaintiffs' Request for Expedited Hearing was forwarded to Counsel for Defendant by electronic mailing.

/s/ LONNIE L. JOHNSON  
Lonnie L. Johnson

Minutes of Meeting with Bishop Kurt Thomas at Evangelist Temple COGIC  
January 29, 2020

The meeting started around 7:20 pm. *Bishop Thompson* came in with Adjutant leading him saying

Stand for the Bishop; stand for the Bishop..... Elder Christ Edwards, one of his new Supt. Designees started the meeting with a song. He stated he had a request and that was “No Recording” of the meeting. There were 75 present.

*Bishop Thompson* stated he was there to talk about recent developments. There will be a time to ask questions. He stated I will be giving directions in which he intends to move forward.

*Bishop Thompson* stated **“the General Board voted for him to take charge of the Evangelist Temple church and it was not his desire to pastor the church.”** He said **“I had always had too much respect for Pastor Kyles to come and pastor this church.”** He said **“you may not like this, but I really do mean it.”**

*Bishop Thompson* stated **“I do intend to carry out my responsibility put on me by the General Board. I was asked to assume the responsibility of Texas Southeast. They voted me as the Bishop. I have respect for Pastor Kyles but I did not run for Bishop. I was the only Bishop in State of Texas who did not run for Bishop.”**

*Bishop Thompson* stated **“I took an oath to uphold and defend the onstitution of the Church of God In Christ. Doing what was Constitutionally required him to do.”**

He then had a copy of something that was passed out, he said, at one of his meetings. Did everyone get a copy? He stated that Elder Fitzgerald lied and said he did not pass out any papers. Elder Fitzgerald made a comment and

*Bishop Thompson* told him to be quiet or he would have him led out.

He then talked about the Trial of a Pastor. He stated that there had been a meeting with several members of the Evangelist Temple Church and a meeting with Pastor Kyles by the Investigative Committee he had chosen. The Investigative Committee reported back to him and said there was not enough evidence to warrant a trial.

<b>EXHIBIT</b> <b>B</b>
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He stated “**he had been served an appeal to go to the Judiciary Board.**”

Sis. Margaret Grayson asked the question, who sent the appeal because she was not aware of it.

*Bishop Thompson* stated “I do not know yet.”

Missionary Joann Ardoin had questions about the parsonage. There was discussion and

*Bishop Thompson* asked who were the Trustees and Attorney Ysidra Kyles gave information on how the parsonage had been paid for by Bishop Kyles and it was taken out of the church’s name and put into his name.

*Bishop Thompson* asked “**is there a secretary for the Trustee Board?**” Atty. Kyles said “yes, Sis. Ann McQueen-Benson, but she was Ann McQueen at that time.”

*Bishop Thompson* asked if Sis. McQueen was present and she was. Sis. McQueen-Benson stated it was true what Attorney Kyles had said. *Bishop Thompson* then told Missionary Ardoin in a court of law, they would ask for the secretary and if the information was as stated, the case is a dead issue. He stated this is a dead issue and should not come up again. She could take it up with a Judge if she still has a problem.

Bishop Thompson stated again “**that ALL twelve (12) General Board members voted unanimously to send him down here.**”\_He stated he would take his sanctions on what Bishop Kyles is required to do.

He stated “**Elder Terence Kirk never had been empowered to appoint a Trustee Board. He was put there to be Administrative Pastor to assist him. Many times he had been called Pastor in his presence and Elder Kirk would call him and apologize.**”

He stated “**he had received numerous calls about the Trustee Board.**”

*Bishop Thompson* asked “**how had the Trustee Board been chosen in the past.**” Lady Louisa Kyles stated at the annual Church Leadership, which was the first Saturday in January of each year and a list of all officers were given. Trustee names were given at that time and voted on at that meeting.



*Bishop Thompson* read from the COGIC Manual about the Trustee Board members and the way it had been done was legitimate.

*Bishop Thompson* stated **“that there would be a list for all persons who wished to serve on the Trustee Board to submit to the office their name no later than February 9, 2020. There would be a special meeting called for two (2) consecutive Sundays to vote on Trustee. All the required information needed on all persons will gotten.”**

*Bishop Thompson* stated **“the Constitution says the church can be set in order by the Jurisdictional Bishop.”** He stated the date of election will be announced over the pulpit.”

The question came up that there are people who are not members of ET present. *Bishop Thompson* asked if there were members who were not members to stand, told Elder Terence Kirk, I am not talking about you. No one stood. Sis. Carlin Joubert stated Elizabeth Brannon. *Bishop Thompson* asked Sis. Brannon was she a member of Evangelist Temple. She stated to go to The Great Commandment Church and Bishop Kyles was her pastor. (Elizabeth and her husband are members). *Bishop Thompson* asked were there any other persons who were members or go to Great Commandment (he really kept saying Great Command )? A few others that were present stood. Lady Kyles stated that The Great Commandment Church has not taken in any members. These are persons who come and support. (They are all ET members). He then stated that if attending The Great Commandment Church, according to the Constitution, they cannot have dual membership. He read about the tithe, offering or put in escrow. Where were their tithe and offerings going? Some of the members stated they support both. *Bishop Thompson* stated they had to choose to be a member of ET or The Great Commandment Church. Ruling is – got to choose.

Bishop Kyles asked the question about his not receiving income per Bishop Blake's letter. *Bishop Thompson* stated there was another letter where he had to pay money, etc. in around 2015, he didn't have the information. One of the members had a copy of Bishop Blake's letter that had been shown to him which was dated June 2016 and we told him that letter was after the other. Atty. Kyles stated what *Bishop Thompson* had mentioned about the money owed, etc. which was never agreed by his attorneys, they just did what they wanted to do and they did not follow the Constitution.

*Bishop Thompson* stated “as far as the income, he met with the members and they said zero”. He stated “also the Jurisdiction.” He holds the book and signs the checks.

*Bishop Thompson* stated he had put an Advisory Board together. They were asked to stand. It was hurting to see who he had chosen as an Advisory Board. It was about 10 persons that stood. Three of them were sisters. The lady running everything, the felon (Carlin Joubert), her sister handling the money and another sister. I had heard she is on contract. (?) Doing what, I have no idea. Now there are person being paid and I am sure they are, but no money for the Pastor on suspension. He stated he may have not know some things when the Advisory Board was chosen. *Bishop Thompson* said he was asking Elder Terence Kirk to continue to work and assist him and other ministers and various ones on the ministerial staff to preach. He asked all the ministers that were present to stand.

Elder Fitzgerald stood to clarify the statement made earlier where *Bishop Thompson* called him a liar, He stated he did not say Bishop Thompson did not pass out any papers, one word led to another and Bishop Thompson was going to have his security take over, Elder Fitzgerald said, “no one in here is big enough to put me out, but I will excuse myself.” He was not allowed to clear himself.

Sis. Margaret Grayson, stood and talked about how she almost lost it when all this started, but God had to help her. She forgives and we must move on. She loves Bishop and Lady Kyles.

Atty. Kyles had been moved to the front row, because she and Bro. Obie Thompson had gotten into it and he and raised up behind her and she was getting ready to react and Bishop Thompson told her to sit on front row. Atty. Kyles expressed there is a lot of hurt on the church’s part and on the part of the Kyles family. She stated there were some people there that had mutual feelings where she was concerned. There is a lot of healing that needs to be done. She stated she wasn’t coming to the church now because someone from ET sent her an anonymous letter telling her to stay away. What had she done? They were not bold enough to even sign the letter.

*Bishop Thompson* stated again that “Pastor Kyles was the Pastor on suspension. Since the Investigative Committee could not warrant a trial he had met with Bishop Kyles and there were three (3) stipulations put on him.”

1. **He had to get counseling**
2. **The Great Commandment Church had to be dissolved or brought into the Church of God In Christ and he would appoint the Pastor.**
3. **He would be under two (2) years jurisdictional supervision by the Jurisdictional Bishop.**

*These were his stipulations. (????) Now this man has been on suspension for almost five (5) years and an Auxiliary Bishop (?) is going to put a stipulation on him and supervise him for another 2 years. Come on now. This sounds like a JOKE. Wake me up when this is over.*

He stressed the point all through the meeting he was “The Bishop!”

He then asked if everyone would work with “The Bishop?” He individually asked the Kyles Family.

He asked Mother Kyles and she said, “I would do what I could.” He stated “that was not good enough, if your husband was going to something (I don’t know what he said, I am sure it was like Pastor or something of that sort, you would have to agree to work with him). She said, “I will work with the Bishop”.

*Bishop Thompson stressed the fact that **“this was family business and should stay in the house. It should not go out. Because he will not be bullied from email that goes with a lot of lies.”***

Attorney Kyles stated that “no one is bullying you. *Bishop Thompson* said, “I was not talking about you.” She said “I am sure you are talking about Elder Moses Tyson.” *Bishop Thompson* nodded and said “exactly.” She said, “He was not bullying you, he stepped up to the plate and did what nobody else would do. He was admonishing and strongly warning you.” She then said, “we love you and don’t want to see you go to jail.”

*Bishop Thompson* expressed the number present and that was the largest number since he has been calling meetings. It is usually just a few. From now on when “the Bishop” calls a meeting, he would like to see this kind of turn out.

*Bishop Thompson* stated when he calls a meeting; the first thing he asks to see is the finances. They write the checks and he does the balancing. Check and Balance.

Meeting adjourned with some hugging and conversation about 10:30 pm.

**JUDICIARY BOARD**  
**CHURCH OF GOD IN CHRIST, INC.**  
**World Headquarters**

*930 Mason Street*

*Memphis, TN. 38126*

*Bishop Martin Luther Johnson, Chief Justice \* Bishop Enoch Perry III, Esq., Vice, Associate Justice*

*Elder Peter Johnson Davis, Esq., Secretary, Associate Justice*

May 11, 2020

**Evangelist Temple**  
**Church Of God In Christ**  
**11603 Martin Luther King Blvd.**  
**Houston, Texas 77048**

RE: Evangelist Temple COGIC vs. Pastor Rufus Kyles, Jr.  
File No: 02072020

Evangelist Temple COGIC:

We have received your Petition for review in the above referenced matter. After careful consideration, we have determined the following:

- The Constitutional procedures for filing a Petition for consideration and adjudication by the Judiciary Board have not been followed;
- The substantive issues set forth in the Petition are not constitutionally appropriate for consideration by the Judiciary Board; and
- The substantive issues set forth in this Petition that may evolve into matters that are appropriate for consideration by the Judiciary Board are not “ripe” for our review, as the Petitioner has not exhausted judicial remedies available in the lower court system of the Church of God in Christ.

Therefore, the Judiciary Board, respectfully, hereby:

- (i) Declines this request for consideration of the matters stated in the Petition; and
- (ii) Returns this Petition to its sender in its entirety, without prejudice.

If you desire to pursue the matters set forth in your Petition, we encourage you to review the rules of procedure for filing such petitions within the jurisdictional lower court system, the appeals process, and if necessary, appeal to the Judiciary Board, so that these issues can be appropriately resolved.

In His Service,

*/s/ Martin L. Johnson*  
Bishop M. L. Johnson, Chief Justice

*/s/ Peter J. Davis*  
Elder P. J. Davis, Esq., Assoc. Justice/Secretary

*Associate Justices: Dr. Valda L. Slack \* Bishop Charles E. Connor \* Assistant Supervisor Mother Casandra Lewis\**

*Supervisor Mother Diana Banks\* Dr. Carl King\* Elder Jonathan Saffold, Jr., Esq.*

*\* Overseer Andre Johnson, Esq., Clerk of the Court*

*Office of Judiciary Board Secretary: P O Box 10141, Birmingham, AL 35202*

**EXHIBIT**

**C**

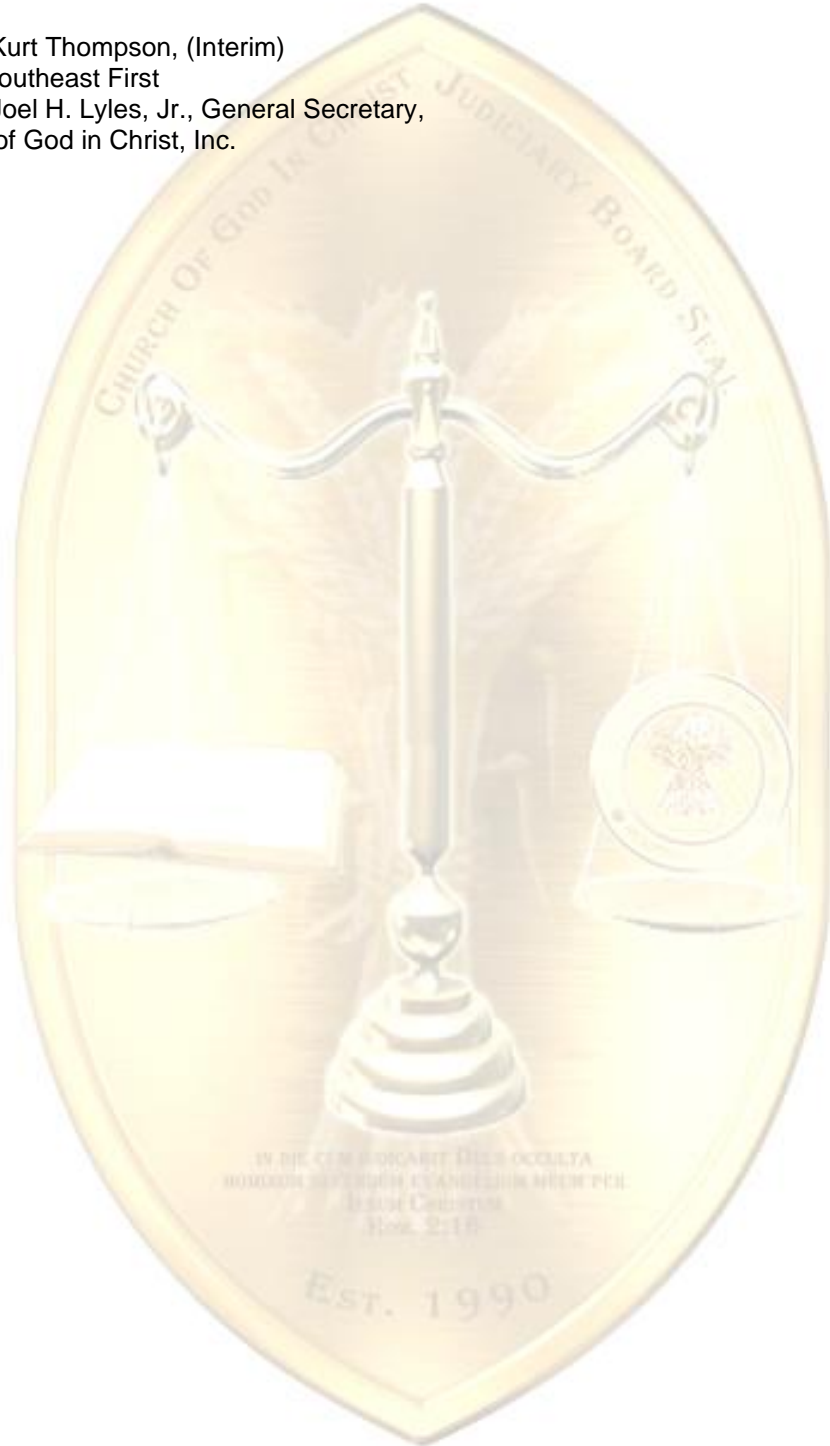
**JUDICIARY BOARD**  
**CHURCH OF GOD IN CHRIST, INC.**  
**World Headquarters**

*930 Mason Street  
Memphis, TN. 38126*

*Bishop Martin Luther Johnson, Chief Justice \* Bishop Enoch Perry III, Esq., Vice, Associate Justice  
Elder Peter Johnson Davis, Esq., Secretary, Associate Justice*

CC:

Bishop Kurt Thompson, (Interim)  
Texas Southeast First  
Bishop Joel H. Lyles, Jr., General Secretary,  
Church of God in Christ, Inc.



*Associate Justices: Dr. Valda L. Slack \* Bishop Charles E. Connor \* Assistant Supervisor Mother Casandra Lewis\*  
Supervisor Mother Diana Banks\* Dr. Carl King\* Elder Jonathan Saffold, Jr., Esq.  
\* Overseer Andre Johnson, Esq., Clerk of the Court  
Office of Judiciary Board Secretary: P O Box 10141, Birmingham, AL 35202*

# Evangelist Temple COGIC

11603 Martin Luther King BLVD  
Houston, TX 77048

January 30, 2018

## Financial Report

### Salaries: Monthly Basis

Pastor Terence K. Kirk  
\$ 1,300.00

Paid staff:  
\$ 4,600.00

Paid musicians:  
\$ 5,000.00

Church Insurance with IPFS  
\$ 903.00

Progressive Ins. (church van)  
\$ 389.08

AmeriPower (light bill)  
\$ 1400.00 avg.

Sam's Club  
\$ 200.00 avg.

Office Depot  
\$ 200.00 avg

<b>EXHIBIT D</b>
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# Evangelist Temple COGIC

11603 Martin Luther King BLVD  
Houston, TX 77048

January 30, 2018

## Financial Report

### Salaries: Monthly Basis

Pastor Terence K. Kirk  
\$ 1,300.00

Paid staff:  
\$ 4,600.00

Paid musicians:  
\$ 5,000.00

Church Insurance with IPFS  
\$ 903.00

Progressive Ins. (church van)  
\$ 389.08

AmeriPower (light bill)  
\$ 1400.00 avg.

Sam's Club  
\$ 200.00 avg.

Office Depot  
\$ 200.00 avg

Home Depot  
\$ 200.00 AVG.

Houston Food Bank  
\$ 1,000.00

City of Houston  
\$ 70.00 avg. (water bill)

Center Point  
\$ 30.00 avg (gas bill)

Comcast  
Cable, internet  
\$ 177.00 avg.

Kwik Kopy  
Tithe envelopes  
499.00 every 3 months

*check on lower rate*

11/01/2018  
ARS – repaired AC in Fellowship Hall & open drainage  
In kitchen and under stage in Fellowship Hall  
\$ 1,089.00

Southeast A/C & Heating  
Installed 5 ton unit in kitchen 8/7/2018  
\$ 5, 400.00

Crews Telephone & Data SVC  
Reprogram phone system, fax line & changed monitor  
Connections 5/25/2018  
\$ 268.00



# Evangelist Temple COGIC

11603 Martin Luther BLVD

Houston, TX 77048

## Financial Report

Yearly 2019

Church Staff

\$136,668.00

Church Insurance:

\$12,132.00

Reliant Alliance

\$15,594.50

Sam's Club

\$5200.00

Center Point / gas

\$850.00

Home Depot

\$3600.00

Houston Food Bank

\$ 1200.00

City of Houston /H2O

\$1213.00

Comcast  
\$2,784.00

Kwik Kopy  
\$2315.00

ARS  
\$ 2550.00

Southeast A/C & Heating  
\$5400.00

Freddie Lee A/C Repair  
\$2400.00

Crews Telephone SVC.  
\$4175.00

Wilson Security (new cameras)  
\$5711.00

Al Patino Lawn Care  
\$2600.00

Butler Organ Co.  
\$181.00

Just coolant Refri.  
\$462.00

Sims Pest Control  
\$930.00

Office Depot  
\$6100.00

Nexus Disposal  
\$1567.00

Compton Florist  
\$500.48

Texas Southeast #1  
\$1,920.00

Robert E. Woodard District  
\$600.00 – church report

Special Events  
\$4500.00

Outreach  
\$12,000.00

F & F Keya  
350.00

**\$233,550.50 totaling**

**Tithes, Offering, etc.**

<b>Total:</b>	<b>\$278,135.49</b>
<b>Less Expense:</b>	<b>- \$233,550.50</b>
<b><u>Balance for 2019:</u></b>	<b><u>\$ 44,584.99</u></b>

# Evangelist Temple COGIC

11603 Martin Luther BLVD

Houston, TX 77048

## Financial Report

Yearly 2020

Church Staff  
\$114,215.00

Church Insurance:  
\$12,132.00

Reliant Alliance  
\$13,126.00

Sam's Club  
\$3300.00

Center Point -gas  
\$480.00

Home Depot  
\$3100.00

Houston Food Bank  
\$ 600.00

City of Houston / H2O  
\$2286.76

AT & T  
\$1,595.00

Comcast  
\$1475.40

Snappy Printing  
\$1000.00

Crews Telephone SVC.  
\$2600.00

Wilson Security  
\$1,955.28 (New Camera)

Pedro Rivera / Exit lights/breaker  
\$1,258.00

Sims Pest Control  
\$1,640.00

Office Depot  
\$6100.00

Nexus Disposal  
\$1756.56

Compton Florist/Bereavement  
\$700.00

Robert E. Woodard District  
\$600.00 – church report

Special Events  
\$4500.00

Outreach  
\$10,000.00

Labor Permits / Posters  
\$1,211.21

Butler Organ  
\$181.00

City Permits  
\$600.00

PPP/Safety Equipment  
\$6100.00

AL Patino / Lawn care  
\$2400.00

Freddie Lee / A/C & Heating  
\$ 3600.00

Mailing, Certified mail etc  
\$200.00

Church Credit Cards  
9600.00

Ricardo Construction  
\$11,300.00

Fire Extinguisher Inspection  
\$321.00

Texas Southeast Legal Fees  
\$1,172.24

TSE #1  
\$1200.00

Victor Villasenar / AC  
\$420.00

A.Z Q Electric  
\$85.00

Just Cooling Refrig.  
\$504.80

Fire Alarm Permit  
\$ 88.92

F &F Keys  
\$549.30

Security Personnel  
\$600.00

Mark Pantoja / A/C  
\$503.00

**\$257,456.47 Totaling**

Tithes, Offering, etc.

Total:	\$235,678.00
Less Expense:	<u>- \$257,456.47</u>
Balance for 2019:	<u>( \$ -21,778.47 )</u>



**Estimated Monies Owed Bishop Rufus Kyles from  
Evangelist Temple Church of God In Christ  
As of 2016 - February 2021**

**2016**

Salary/Insurance - January – June	\$ 32,000.00
( $\$1,000 \times 26 \text{ wks.} = \$26,000 + \$1,000 \times 6 \text{ mos. for ins.}$ )	
July-December	\$ 58,000.00
( $2,000 \times 26 \text{ wks} = 52,000 + \$1,000 \times 6 \text{ mos. for ins.} = \$6,000$ )	
Pastor & Wife's Anniversary	<u>30,000.00</u>
	<b>\$ 120,000.00</b>

**2017**

Salary/Insurance – January – December	\$ 116,000.00
( $\$2,000 \times 52 = \$104,000 + \$1,000 \times 12 \text{ mos. for ins.} = \$12,000$ )	
Pastor & Wife's Anniversary	<u>30,000.00</u>
	<b>\$ 146,000.00</b>

**2018**

Salary/Insurance – January – December 31	\$ <u>116,000.00</u>
( $\$2,000 \times 52 \text{ wks} = \$104,000 + \$1,000 \times 12 \text{ mos.} = \$12,000$ )	
Pastor & Wife's Anniversary	<u>30,000.00</u>
	<b>\$ 146,000.00</b>

**2019**

Salary/Insurance – January – December 31	\$ 116,000.00
( $\$2,000 \times 52 \text{ wks} = \$104,000 + \$1,000 \times 12 \text{ mos.} = \$12,000$ )	
Pastor & Wife's Anniversary	<u>30,000.00</u>
	<b>\$ 146,000.00</b>

**2020**

Salary/Insurance – January	(\$9,000)	\$ 9,000.00
Salary/Insurance – February	(\$9,000)	\$ 9,000.00
Salary/Insurance – March	(\$11,000)	\$ 11,000.00
Salary/Insurance – April	(\$9,000)	\$ 9,000.00
Salary/Insurance – May	(\$11,000)	\$ 11,000.00
Salary/Insurance – June	(\$9,000)	\$ 9,000.00
Salary/Insurance – July	(\$9,000)	\$ 9,000.00
Salary/Insurance – August	(\$11,000)	\$ 11,000.00
Salary/Insurance – September	(\$9,000)	\$ 9,000.00
Salary/Insurance – October	(\$9,000)	\$ 9,000.00
Salary/Insurance – November	(\$11,000)	\$ 11,000.00
Salary/Insurance – December	(\$9,000)	<u>\$ 9,000.00</u>
		<b>\$ 116,000.00</b>

<b>EXHIBIT E</b>
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**Estimated Monies Owed Bishop Rufus Kyles, Jr. from Evangelist Temple COGIC**  
**Page 2**

**2021**

Salary/Insurance – January	(\$11,000)	\$	11,000.00
Salary/Insurance – February	(\$9,000)	\$	<u>9,000.00</u>
		\$	20,000.00

**TOTAL** **\$ 694,000.00**

**Personal Money in Treasure** **\$ 19,000.00**

**TOTAL** **\$ 713,000.00**

*(Note: The above figures do not include monies given to assist in attending Jurisdictional/National Meetings, etc. nor 2020 for Pastor & Wife's Anniversary)*

**Special Note: First Lady Louisa Kyles received \$1,000 each 5<sup>th</sup> Sunday**

2016 – 4 Fifth Sundays = \$4,000.00	2019 – 4 fifth Sundays = \$4,000.00
2017 – 5 fifth Sundays = \$5,000.00	2020 – 3 fifth Sunday = \$3,000.00
2018 – 4 fifth Sundays = \$4,000.00	2020 - 4 fifth Sunday = \$4,000.00
	2021 - 1 fifth Sunday = <u>\$1,000.00</u>
<b>Total owed Lady Kyles</b>	<b>\$22,000.00</b>

**Estimated Total Owed to Kyles Family as of 02/28/2021** **\$735,000.00**

*(Note: If we added 20% interest to the 735,000 it would be \$147,000 making a total of \$ 882,000.00)*

**Estimated Owed \$735,000.00**  
**(20% Interest \$882,000.00)**

**\*\*Total Estimated Owed from ET - \$882,000 .00**

**NOTE: If not paid by end of February 20% will be continue to be added to Estimated Monies Owed.**

**Estimated Monies Owed Bishop Rufus Kyles from  
Texas Southeast First  
2015 - February 2021  
(Includes Jurisdictional & District Meetings)**

**2015**

District Meetings	\$ 3,000.00
Houston Central, East Texas Fellowship, Galveston)	
43 <sup>RD</sup> Holy Convocation	20,000.00
Bishop's Conference	2,000.00
Harvest Fest	3,000.00
Holy Convocation – St. Louis	<u>5,000.00</u>
<b>Total</b>	<b>\$ 33,000.00</b>

**2016**

District Meetings	\$ 20,000.00
Ministers' & Workers' Meeting	15,000.00
April Call	5,000.00
Women's Conference	5,000.00
Women's International Convention (Red Card)	650.00
AIM	2,000.00
44 <sup>th</sup> Holy Convocation	40,000.00
Bishop's Conference	2,000.00
Harvest Fest	3,000.00
Holy Convocation – St. Louis	<u>5,000.00</u>
<b>Total</b>	<b>\$ 97,650.00</b>

**2017**

District Meetings	\$ 20,000.00
Ministers' & Workers' Meeting	15,000.00
April Call	5,000.00
Women's Conference	5,000.00
Women's International Convention (Red Card)	650.00
AIM	2,000.00
45 <sup>th</sup> Holy Convocation	40,000.00
Bishop's Conference	2,000.00
Harvest Fest	3,000.00
Holy Convocation – St. Louis	<u>5,000.00</u>
<b>Total</b>	<b>\$ 97,650.00</b>

**Estimated Monies Owed Bishop Rufus Kyles from TSE#1 Jurisdiction/Districts Cont'd.**  
**Page 2**

**2018**

District Meetings	\$	20,000.00
Ministers' & Workers' Meeting		15,000.00
April Call		5,000.00
Women's Conference		5,000.00
Women's International Convention (Red Card)		650.00
AIM		2,000.00
46 <sup>th</sup> Holy Convocation		40,000.00
Harvest Fest		3,000.00
Holy Convocation – St. Louis		<u>5,000.00</u>
<b>Total</b>	<b>\$</b>	<b>95,650.00</b>

**2019**

District Meetings	\$	20,000.00*
Ministers' & Workers' Meeting		15,000.00
April Call		5,000.00
Women's Conference		5,000.00
Women's International Convention (Red Card)		650.00
AIM		2,000.00
47 <sup>th</sup> Holy Convocation		40,000.00
Harvest Fest		3,000.00
Holy Convocation – St. Louis		<u>5,000.00</u>
<b>Total</b>	<b>\$</b>	<b>95,650.00</b>

**2020**

District Meetings	\$	20,000.00
Ministers' & Workers' Meeting		15,000.00
48 <sup>th</sup> Holy Convocation		<u>40,000.00</u>
	<b>\$</b>	<b>75,000.00</b>

**2021**

District Meetings	\$	<u>5,000.00</u>
	<b>\$</b>	<b>5,000.00</b>

**As of 02/28/2021:**                      **Total for Jurisdiction/Districts        \$ 499,600.00**

Estimated Monies Owed Bishop Rufus Kyles from TSE#1 Jurisdiction/Districts Cont'd  
Page 3

**NOTE: If estimated amounts given Lady Kyles were added:**

Lady Louisa Kyles received from Juris. Women's Convention

(\$750-\$1,000) - \$750 X 4 = \$3,000.00

Red Card From Jurisdiction Women's Department

Red Card for 2015-2019 would be 4 x \$525 = \$ 2,100.00 = 1 @ \$625=\$2,725.00

Total estimated owed Lady Kyles (from Jurisdictional Women's  
Conference) \$ 5,725.00

Workers Meeting - \$500 x 4 = \$ 2,000.00

Convocation - \$1,000 x 6 - \$ 6,000.00

Total estimated owed Lady Kyles \$ 8,000.00

Estimated Grand Total \$ 13,725.00

As of 02/28/2021 - Estimated Grand Total to Kyles Family \$ 513,325.00

(Note: If we add 20% it would = \$102,665.00 making the total owed \$615,990.00 )

**Special Notice:**

(National Leadership Meetings were not included for 2015, 2016, 2017, 2018, 2019, 2020)

*Since April Call was delayed, it is not included in April's total*

*Estimated Monies Owed from Texas Southeast #1*

*\$ 513,325.00*

*(Add 20% Interest - \$615,990.00)*

**Estimated Total Owed from Texas Southeast #1**

**\$615,990.00**

***NOTE: If not paid by end of February 20% will be continue to be added to  
Estimated Monies Owed.***

**Recap of Estimated Monies Owed Bishop Rufus Kyles  
From Evangelist Temple COGIC and Texas Southeast #1  
As of 2015-February 2021**

Evangelist Temple	\$ <u>735,000.00</u>
(With 20% = \$147,000 - making a total of \$ 882,000 )	
Total	\$ 882,000.00
 Texas <u>Southeast</u> First	 \$ <u>513,325.00</u>
(With 20% = \$102,665 - making a total of \$615,990 )	
Total	\$ 615,990.00

**Grand Estimated Total owed at end of February 2021:**

\$1,248,325 add 20% \$ 249,665 = \$ 1,497,990.00

**\$ 1,497,990.00**

***NOTE: If monies not paid by end of February 2021, will continue adding 20%  
interest.***

***This is an Update for February 2021***

**GENERAL BOARD**  
**Church Of God In Christ**  
930 Mason Street  
Memphis, Tennessee 38126

November 17, 2015

Board of Trustees  
Evangelist Temple Church Of God In Christ  
11603 Martin Luther King Blvd.  
Houston, TX 77048

Dear Trustees and Members:

As you know, in June 2015, the General Board of the Church Of God In Christ (the "General Board") suspended Bishop Rufus Kyles, Jr. in response to certain allegations of misconduct brought against him. In light of the recent ecclesiastical trial, findings and recommendation of Board of Bishops of the Church Of God In Christ (the "Board of Bishops"), the General Board, on November 17, 2015, removed Bishop Kyles from the Office of Bishop. Pursuant to its authority granted under the 2002 Misconduct Resolution of the General Assembly, the General Board shall continue its general oversight over the affairs of Evangelist Temple Church Of God In Christ ("Evangelist Temple"), as follows:

1. Bishop Kyle's suspension from all of his credentials, authority and responsibilities with the Church Of God In Christ, including his pastoral authority and responsibilities at Evangelist Temple, shall continue. As such, Bishop Kyles shall be prohibited from the following:

- a. Wearing clerical vestments of any office of the Church Of God In Christ;
- b. Sitting in the pulpit or any position of ministerial authority, however, he may attend church services as a parishioner seated in the congregation;
- c. Appointing any person in his stead to have ministerial, administrative, or fiscal authority at Evangelist Temple;
- d. Providing any marriage or spiritual counseling to parishioners or others; and
- e. Performing any ordinance of the church, including, but not limited to, marriage ceremonies, water baptism, communion, and funerals.

2. Presiding Bishop Charles E. Blake, Sr., with the assistance of Bishop Brandon B. Porter, shall continue to oversee and manage the ministerial, fiscal and administrative affairs of Evangelist Temple until the pastorate of Evangelist Temple is resolved by the General Board.

<b>EXHIBIT</b> <b>F</b>
----------------------------

3. Bishop Kyles shall receive no compensation from Evangelist Temple until a recommendation regarding his compensation is made by the membership of Evangelist Temple and such recommendation is approved by the General Board.

4. Bishop Porter will work with the membership of Evangelist Temple to deliberate and express to the General Board the membership's sentiments regarding the future pastorate of Evangelist Temple.

Should you have any questions regarding this letter, please contact my office. Please keep in mind that these stipulations are not optional but are direct mandates from the General Board and shall be in effect until such time as you receive written notice otherwise.

Respectfully Yours,

Bishop Charles E. Blake, Sr.  
Presiding Bishop  
CHURCH OF GOD IN CHRIST, INC.

Bishop L.H. Winbush  
Secretary, General Board  
CHURCH OF GOD IN CHRIST, INC.



# Church Of God In Christ, Inc.

International Headquarters  
Memphis, Tennessee



Office of the Presiding Bishop

**GENERAL BOARD**  
**Church Of God In Christ**  
930 Mason Street  
Memphis, Tennessee 38126

June 2, 2016

Board of Trustees  
Evangelist Temple Church Of God In Christ  
11603 Martin Luther King Blvd.  
Houston, TX 77048

Dear Trustees and Members:

As some of you may be aware, on May 27, 2016, the Judiciary Board of the Church Of God In Christ (the "Judiciary Board") overturned the decision of the Board of Bishops to remove Bishop Rufus Kyles, Jr. from the Office of Bishop and, instead, ordered that he be retried by the Board of Bishops on the allegations of misconduct brought against him. The Judiciary Board's order essentially brings the parties back to the same place they were in prior to Bishop Kyle's trial.

Therefore, the General Board's suspension of Bishop Kyles shall continue until the matter is resolved and the General Board's general oversight over the affairs of Evangelist Temple Church Of God In Christ ("Evangelist Temple") shall continue as follows:

1. Bishop Kyle's suspension from all of his credentials, authority and responsibilities with the Church Of God In Christ, including his pastoral authority and responsibilities at Evangelist Temple, shall continue. As such, Bishop Kyles shall be prohibited from the following:

- a. Wearing clerical vestments of any office of the Church Of God In Christ;
- b. Sitting in the pulpit or any position of ministerial authority, however, he may attend church services as a parishioner seated in the congregation;


- c. Appointing any person in his stead to have ministerial, administrative, or fiscal authority at Evangelist Temple;
- d. Providing any marriage or spiritual counseling to parishioners or others; and
- e. Performing any ordinance of the church, including, but not limited to, marriage ceremonies, water baptism, communion, and funerals;

2. Presiding Bishop Charles E. Blake, Sr., with the assistance of Bishop Brandon B. Porter, shall continue to oversee and manage the ministerial, fiscal and administrative affairs of Evangelist Temple until the pastorate of Evangelist Temple is resolved by the General Board; and

3. Bishop Kyles shall continue to receive compensation from Evangelist Temple based on the recommendation of the membership of Evangelist Temple, approved by the General Board.

Should you have any questions regarding this letter, please contact my office. Please keep in mind that these stipulations are not optional but are direct mandates from the General Board and shall be in effect until such time as you receive written notice otherwise.

Respectfully Yours,



Bishop Charles E. Blake, Sr.

Presiding Bishop

The Seventh in Succession

CHURCH OF GOD IN CHRIST, INC.

cc: Members of the General Board  
Bishop Frank O. White, Assistant General Board Secretary  
Bishop Joel H. Lyles, Jr., General Secretary  
Bishop John H. Sheard, Chairman of the Board of Bishops  
Bishop James Hunt, Chairman of the General Assembly  
Elder Uleses C. Henderson, Jr., General Counsel

# Church Of God In Christ, Inc.

International Headquarters  
Memphis, Tennessee



Office of the Presiding Bishop

November 19, 2019

Elder Rufus Kyles, Jr.  
11603 Martin Luther King Blvd.  
Houston, Texas 77048

Dear Elder Kyles:

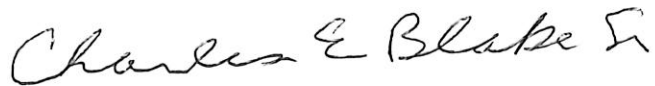
This letter is to inform you that you are still under suspension from the pastorate of Evangelist Temple Church Of God In Christ, in Houston, Texas. We understand that there is some confusion regarding your current status as pastor of the church.

As you know, pursuant to the Board of Bishops' July 5, 2018 Final Order and Judgment and the Judiciary Board's May 30, 2019 Order sustaining the same, the General Board accepted and has now enforced the Board of Bishop's recommendation that you be removed from the bishopric of the Church of God in Christ. Therefore, Bishop Kurt Thompson currently serves as the interim bishop of the Texas Southeast First Ecclesiastical Jurisdiction. These actions were ratified by the General Assembly of the Church of God in Christ on November 12, 2019.

In addition, a complaint has been filed against you by members of Evangelist Temple. The complaint has been referred to the Pastors and Elders Council of the Texas Southeast First Ecclesiastical Jurisdiction for further review and adjudication. Therefore, you are suspended from the pastorate of Evangelistic Temple until the charges filed against you have been resolved

by the Pastors and Elders Council of the Texas Southeast First Ecclesiastical Jurisdiction.

Respectfully Yours,

A handwritten signature in black ink that reads "Charles E. Blake Sr." in a cursive script.

Bishop Charles E. Blake, Sr.  
Presiding Bishop  
CHURCH OF GOD IN CHRIST, INC.

Bishop Sedgwick Daniels.  
Secretary, General Board  
CHURCH OF GOD IN CHRIST, INC.

cc:   Members of the General Board  
      Bishop Lawrence M. Wooten, Sr., Assistant General Board Secretary  
      Bishop Joel H. Lyles, Jr., General Secretary  
      Bishop John H. Sheard, Chairman of the Board of Bishops  
      Bishop Lemuel F. Thuston, Chairman of the General Assembly  
      Elder Michael Eaddy, Chairman of General Council of Pastors and Elders  
      Elder Uleses C. Henderson, Jr., General Counsel

# ***Bishop Rufus Kyles***

3405 Parkside Drive  
Pearland, TX 77584  
(713) 530-1689

---

March 3, 2021

Bishop Sedwick Daniels  
3500 W. Mother Daniels Way  
Milwaukee, WI 53209  
*Via Email Transmission [hsd@hrmke.org](mailto:hsd@hrmke.org)*

## ***Re: Bishop Rufus Kyles - Chronological Series of Events***

Greetings Bishop Daniels,

It is my sincere desire that this communique finds you in the best of health and enjoying the magnificent blessings and benefits of our Lord and Savior Jesus Christ.

The purpose of this correspondence is to provide you with an accurate description of the events that have occurred as it relates to my status and suspension over the past year and four months. I am attaching several exhibits for your convenience and review.

- **November 19, 2019:** Letter from Bishop Blake *referring* my case to the Texas S.E. 1<sup>st</sup> Pastors and Elders Council. The letter expressly stated, "... Therefore you are suspended from the pastorate of Evangelistic Temple until the charges filed against you have been resolved by the Pastors and Elders Council of the Texas First Ecclesiastical Jurisdiction." *(Exhibit attached)*
- **January 18, 2020:** I met with the Texas S.E. 1<sup>st</sup> Investigative Committee. Following the meeting, I was supposed to receive notification **in writing** of the findings. *Neither Bishop Thompson nor anyone from his Investigative Committee provided me with any such written notification of the findings.* As a matter of fact, I was not made aware of the Committee's findings until Bishop Thompson publicly made an announcement in the presence of the Evangelist Temple congregation on January 29, 2020.
- **January 29, 2020:** A business meeting was held at Evangelist Temple. At approximately 7:20 PM during that meeting, Auxiliary Bishop Kurt Thompson publicly announced that the Investigative Committee reported back to him and that "there was not enough evidence to warrant a trial." Bishop Thompson further stated that certain members of Evangelist Temple had given him a copy of an appeal to the Judiciary Board just before the start of the January 29, 2020 meeting. *(Exhibit attached)* Bishop Daniels, as you are aware,

**EXHIBIT**

**I**

Article VIII **does not** provide for the appeal of an Investigating Committee's findings; and nor does it allow for direct appeal to the Judiciary Board.

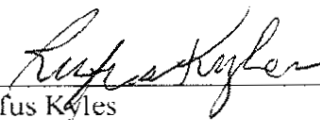
- **May 11, 2020:** The Judiciary Board declined the request for consideration for *File Number 02072020*, which should have been a death blow to the charges. *(Exhibit attached)*
- **July 1, 2020:** Bishop Kurt Thompson sent a letter instructing me to contact the General Board for further action concerning my suspension. *(Exhibit attached)*
- **December 21, 2020:** I received a letter from Bishop Thompson notifying me that, once again, he was appointing an Investigating Committee to investigate an addendum to *Case Number 02072020*. In other words, Bishop Thompson was putting a committee in place to investigate a matter that the Judiciary Board – the “supreme court” of this Church – had already declined to hear, therefore bringing the case to an end. To that end, I can only assume that Bishop Thompson does not understand the COGIC judicial process, or he simply refuses to acknowledge it.
- **February 3, 2021:** I participated in a teleconference with the General Board along with Bishop Kurt Thompson. While still waiting to receive a response from the February 3, 2021 meeting, I received notification that another Jurisdictional Investigating Committee had been implemented by Bishop Thompson.
- **February 28, 2021:** I received an email from email account [lexisouthwest@cox.net](mailto:lexisouthwest@cox.net) informing me of a March 29, 2021 trial date for *Case Number 02072020*. Once again, this is the exact case which the Judiciary Board disposed of and Bishop Kurt Thompson refuses to acknowledge.

Sir, you will recall a phone conference with you, Bishop Thompson and me. In that conversation, we discussed possible solutions for bringing my suspension to an end. Subsequent to that conversation, Bishop Thompson forwarded me a document for my signature; however, due to the fact that what was in the document from Bishop Thompson did not align with we discussed in our phone conversation, I did not sign the document.

It is my prayer that the events described herein will satisfy your request. Should you have any additional comments or concerns, please feel free to reach out to me. I can be reached via email at [bishoprkyles@yahoo.com](mailto:bishoprkyles@yahoo.com) or via phone at (713) 530-1689.

Thank you for your consideration of this matter, and I look forward to hearing from you soon.

For His Kingdom,

  
Rufus Kyles

**GENERAL BOARD**  
**Church Of God In Christ**  
930 Mason Street  
Memphis, Tennessee 38126

March 16, 2021

Board of Bishops Grievance Committee  
Church of God In Christ  
c/o Bishop Roy Dixon, Chairman  
9341 Crest Drive  
Spring Valley, CA 91977

Dear Grievance Committee:

It has been brought to our attention that a complaint has been filed against Bishop Kurt Thompson concerning Elder Rufus Kyles, Jr. and Evangelist Temple Church Of God In Christ in Houston, Texas. We understand that your Committee is presently reviewing the matter. We write this letter to clarify the circumstances surrounding Bishop Thompson's involvement with Evangelist Temple and Texas Southeast First Ecclesiastical Jurisdiction.

On June 5, 2015, the General Board suspended, then, Bishop Rufus Kyles, Jr. from his pastoral duties at Evangelist Temple and his episcopal duties at Texas Southeast First under the General Assembly resolution against misconduct passed in November 2002 (the "2002 Misconduct Resolution"), in response to certain allegations of misconduct made against him by Gabrielle Desiree Bilal. The suspension was to remain in place pending the outcome of the allegations brought before the Board of Bishops.

As you know, on July 5, 2018, the Board of Bishops issued a final order and judgment (the "July 2018 Order") against Bishop Kyles, recommending his removal from the bishopric of the Church of God in Christ. The Judiciary Board sustained the July 2018 Order in May 2019. The General Board issued an Executive Order in August 2019 removing Bishop Kyles from the Office of Bishop and relieving him from all ecclesiastical authority thereto. As such, the General Board appointed Bishop Thompson to serve as interim bishop of Texas Southeast First until a new bishop is assigned to the jurisdiction. The General Assembly ratified these actions of the General Board on November 12, 2019.

<b>EXHIBIT</b> <b>J</b>
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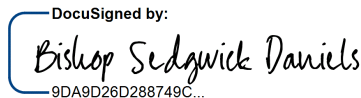
In addition to the claims before the Board of Bishops, a complaint was filed against Bishop Kyles by the membership of Evangelist Temple, which was referred to the Pastors and Elders Council of Texas Southeast First for further review and adjudication. In light of the complaint, on November 19, 2019, the General Board sent, now, Elder Rufus Kyles a letter informing him that he was still under suspension from the pastorate of Evangelist Temple until the charges filed against him by the membership are resolved by the Pastors and Elders Council of Texas Southeast First.

Therefore, Elder Kyles has remained under suspension by the General Board and Bishop Kurt Thompson, acting under the direction of the General Board, was never instructed by the General Board to release Elder Kyles from suspension. We understand that the Pastors and Elders Council of Texas Southeast First will be holding a trial soon to adjudicate the matter.

On February 3, 2021, the General Board met with Elder Kyles and Bishop Thompson and told them that the Board would provide its final directives on the matter by April 3, 2021.

We trust that this clarifies Bishop Thompson's involvement in this matter. Feel free to contact us should you have any questions regarding this letter.

Respectfully Yours,

DocuSigned by:  
  
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Bishop Sedgwick Daniels.  
Secretary, General Board  
CHURCH OF GOD IN CHRIST, INC.

cc: Members of the General Board  
Bishop Lawrence M. Wooten, Sr., Assistant General Board Secretary  
Bishop John H. Sheard, Chairman of the Board of Bishops





TEXAS SOUTHEAST FIRST ECCLESIASTICAL JURISDICTION

*Church of God In Christ, Inc.*

P.O. Box 88110

Houston, Texas 77228-0110

Bishop Kurt L. Thompson, Interim Prelate

*"Now thanks be unto God, which always causeth us to triumph in Christ, and maketh manifest the savour of his knowledge by us in every place."*

II Corinthians 2:14-16

Pastor Rufus Kyles, Jr.  
3405 Parkside Dr.  
Pearland, Texas 77584

July 1, 2020

Dear Pastor Rufus Kyles,

Kindly be advised that your current suspension from the Pastorate of the Evangelist Temple Church of God Christ was not imposed by the Jurisdiction. As you are keenly aware, this action was instituted and enforced by the General Board of the Church of God In Christ. Please consult them for future action.

Sincerely,

Kurt L. Thompson, Interim Prelate

EXHIBIT  
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