GENERAL A JUDICIAL	COUNCIL			
OF THE CHURCH OF GOD IN CHRIST, INC.				
ERIC MCADAMS, JOHNNY BRICE, VERNON GATLIN AND VAN JOHNSON, <i>ET AL</i> .				
COMPLAINANTS				
Vs	Case Number:			
BISHOP BRANDON B. PORTER				

RESPONDENT

PURSUANT TO ARTICLE VIII, JUDICIARY BOARD, DUTIES, ¶ 10

COMPLAINANTS AMENDED PETITION OF OFFICIAL CHARGES

Come Now Eric McAdams, Johnny Brice, Vernon Gatlin and Van Johnson, hereinafter referred to as the Complainants, members of Williams Temple Church of God in Christ Inc., Houston, Texas, and files this herein petition against Bishop Brandon B. Porter, General Board Member of the Church of God in Christ, with headquarters in Memphis, Tennessee and alleges and states as follows;

Bishop Brandon B. Porter, hereinafter referred to as the Respondent, did violate the rules and regulations of the Constitution of The Church of God in Christ, Inc. as follows:

Statement of Facts

This is a case which deals with the oppression of the children of God and a now continuing struggle and appeal to throw off the chains of bondage and to worship God in the beauty of holiness. We have been treated as rebels because we will not bow to the spirit of Haman.

On or about August 30, 2015 the former pastor, Bishop Charles Brown resigned from Williams Temple Church of God in Christ Inc. On September 2, 2015, Respondent arrived at Williams Temple after being assigned as *Interim Pastor* by Bishop Blake. One of the first things Respondent did was to hold a meeting in which he purported to remove the Board of Trustee in a manner that violated the statutes of the State of Texas¹. He is attempting to rewrite the by-laws of Williams Temple (a Texas Non-Profit 501(c) 3 corporation) in a manner that is again a violation of the State of Texas. In Article III, Part II, Section D, paragraph 8, of the constitution of the Church of God in Christ states;

All trustees of local churches shall be members of the Church Of God In Christ. In all cases where the law requires a special mode of election of Church Trustees, that mode must be followed. Trustees of local unincorporated churches and their successors in office shall hold title to all real and personal property, for the use and benefit of the members of the Church Of God In Christ with section 9 hereinafter. Where, however, the law requires no particular mode of election of trustees, they shall be elected by a majority of the members of the congregation, present and voting, in a regular or special business meeting of the church. All special meetings of the church shall be announced on a Sunday preceding the date of the meeting and shall state the purpose of the call and the time and place of the meeting.

When told of this, Respondent acted in a domineering arrogant manner that included

- threatening and bulling the members
- calling the members dumb sheep
- shouting at and humiliating the members

We find this behavior demeaning and unbecoming a minister of the gospel, but even more it is unbecoming a bishop.

¹ Exhibit 3—Affidavit of Dorothy Brice

Brief of Complainant

Ι

ARTICLE VIII § D, ¶1 (a.) —<u>Failure to abide by the laws, rules and regulations of the</u> <u>Church of God in Christ;</u>

Respondent violated Article III, Part II, § D, ¶ 8, when informed of the violation, chose to ignore the information and continued his course of action. The Special Meeting as called was a violation of the Church of God in Christ rule as mentioned above and the laws of the State of Texas. The purpose of the meeting was not given with the oral notification as required by Texas statute Title 2, Chapter 22, Subchapter D,

Sec. 22.156. NOTICE OF MEETING. (a) A corporation other than a church shall provide written notice of the place, date, and time of a meeting of the members of the corporation and, if the meeting is a special meeting, the purpose or purposes for which the meeting is called. The notice shall be delivered to each member entitled to vote at the meeting not later than the 10th day and not earlier than the 60th day before the date of the meeting. Notice may be delivered personally or in accordance with Section 6.051(b). (b) Notice of a meeting of the members of a corporation that is a church is sufficient if given by oral announcement at a regularly scheduled worship service before the meeting or as otherwise provided by the certificate of formation or bylaws

of the corporation.

Respondent did not follow this required law and subjects both the local corporation and the National Corporation to scrutiny from the State of Texas. This failure to obey the laws of the state resulted in the failure to abide by the rules of the Church of God in Christ.²

² Article III, Part II, § D, ¶ 8

ARTICLE VIII § D, ¶1 (a.) — Failure to abide by the laws, rules and regulations of the **Church of God in Christ;**

The house *was not* certified to ascertain the presence of a quorum at this special meeting. The number of persons present must be counted and recorded to establish a quorum. Texas statute Title 2, Chapter 22, Subchapter D defines a quorum as.

QUORUM OF MEMBERS. (a) Unless otherwise provided by Sec. 22.159. the certificate of formation or bylaws of a corporation, members of the corporation holding one-tenth of the votes entitled to be cast, in person or by proxy, constitute a quorum.

The vote of the majority of the votes entitled to be cast by the members (b) present or represented by proxy at a meeting at which a quorum is present is the act of the members meeting, unless the vote of a greater number is required by law or the certificate of formation or bylaws.

As a member of the General Board, (the Board of Directors) of the Church of God in Christ, Respondent has a duty to know the laws of each state in which he executes his office. This failure to obey the laws of the state resulted in the failure to abide by the rules of the Church of God in Christ.³

III

ARTICLE VIII, §D, ¶1 (b): Malfeasance

Malfeasance: is a wrongful act which the actor has no legal right to do, or any wrongful conduct which affects, interrupts, or interferes with performance of official duty, or an act for which there is no authority or warrant of law or which a person ought not to do at all, or the unjust performance of some act, which party performing it has no right, or has contracted not, to do.

(Black's Law Dictionary Sixth Edition)

Respondent illegally removed the local elected Board of Trustees and placed the management of the corporation's affairs into the hands of Bishop Kurt Thompson. This is a violation of Texas Statute, Title 2, Chapter 22, Subchapter E states,

MANAGEMENT BY BOARD OF DIRECTORS. Except as Sec. 22.201. provided by Section 22.202, the affairs of a corporation are managed by a board of directors. The board of directors may be designated by any name appropriate to the customs, usages, or tenets of the corporation.

Acts 2003, 78th Leg., Ch. 182, Sec. 1, eff. Jan. 1, 2006.

³ Article III, Part II, § D, ¶ 8

This causes this corporation to operate outside the confines of the laws of the State of Texas and has the possibility to impact the local and national corporation in a negative way. When advised of the violation of Texas Statutes, Respondent chose to ignore said advice. This violation is an act of malfeasance.

IV

ARTICLE VIII, §D, ¶1 (b): Malfeasance

Respondent under penalty of perjury, did declare himself eligible to become the Resident Agent for the Non Profit Texas corporation, Williams Temple Church of God in Christ, Incorporated. Under the heading Execute of Form 401 of the State of Texas, Respondent affixed his signature, directly under the paragraph which stated,

> "The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Respondent was not and is not eligible to be the Resident Agent under Texas Statute. By affixing his signature to Form 401, Respondent has committed an act of perjury, punishable under State Law, an act of Malfeasance.

V

ARTICLE VIII, §D, ¶1 (b): Nonfeasance

<u>Nonfeasance</u> — An omission to perform a duty, or the total neglect of duty

(Black's Law Dictionary First Edition)

On or about September 8, 2015 a petition⁴ signed by over one-hundred (100) members of Williams Temple Church of God in Christ Inc. requesting the removal of trustee Cari Barnes from all financial duties at the church was presented to Respondent. He refused to act on it stating *"who told you all you could do a petition?"* and would not act on the petition. This petition should have been grounds to remove the named individual; this

⁴ Exhibit 2

was a failure to act on a legitimate petition put forth by the members, an act of Nonfeasance.

VI

<u>ARTICLE VIII, §D, ¶1 (i): Willfully failing or refusing to use means at his command to</u> protect the property, rights and interests of the Church Of God In Christ.

When Respondent failed to act on the petition to remove Cari Barnes, she subsequently withdrew \$42,500.36⁵ without authorization from William's Temple, Inc. The actions of Cari Barnes, both a National Trustee Board member and local Trustee Board member; has deprived the Williams's Temple Corporation, (a State of Texas 501(c) 3 Corporation) of the use of its property which several checks to be returned for insufficient funds⁶. Respondent's failure to act has facilitated this loss.

⁵ Exhibit6

⁶ Exhibit4

Conclusion

Complainants and the members of Williams Temple have been subjected to another hostile demeaning leader. The rights of the members have been trampled on; the laws of the State of Texas have been violated repeatedly. When Respondent was informed of the violations he refused to change and continued committing the violations.

Respondent's actions have caused the loss of \$42,500.36 to Williams Temple, Inc. (a Texas Non-Profit 501(c 3) corporation). Williams Temple, Inc. has incurred additional losses because of returned checks.

We the Complainants request these illegal actions be reversed, the duly elected Board of Trustees and the Resident Agent be restored. We request the funds which were moved without the proper authorization from the membership be returned in full, and the resulting insufficient fund charges be restored to Williams Temple. Also that Respondent be reassigned to another place; this will ensure there are no reprisals for Complainants exercising their rights under the Constitution of both the United States and the Church of God in Christ.

We the Complainants, Eric McAdams, Johnny Brice, Vernon Gatlin, and Van Johnson, members of the Church of God in Christ, Inc., as Complainants in the above and foregoing Petition, affirm that the statements and allegations contained herein are true, and correct on this Monday October 31, 2016.

The AZ

Eric McAdams 11915 Segrest Drive Houston, Texas 77047 (832) 785-4364 ericmac3@att.net

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Johnny Brice 3622 Truesdale Drive Missouri City, Texas 77459 (281)438-9030 jbb4447@yahoo.com

Vernon Gatlin an Johnson

Weldon Meeks

Official Complaint Page 8 of 9 We, the undersigned members of Williams Temple Church of God in Christ do affix our signatures in support and agreement with this herein Complaint filed against Bishop Brandon B. Porter.

Emma McGrew Print Name 10/09/2016 Date Signature uther Hesle fel BARBARA /kslep /fell Print Name Oct / 09/ 2016 Date Print Name Booker Bosker Signature 10/09/2014 Date BARBARA BALLEY Print Name <u>10|9|20</u>14 Date Signature DIANA La Kelley 10916 Print Name Date Signat Lashonda Willis 10,9,16 nt Name Date Print Name Signature Linda White Print Name <u>10/9/16</u> Date Dhalsom alling -1919116 Date Print Name Signature 10 / 9/20/6 Date Onnie Kirk Print Name Ani Print Name Christine Housier Date 10 Signature Doris F. Scolet 11 Daris 4. Scott Signature 1019116 Date

Official Complaint Page 9 of 9

We, the undersigned members of Williams Temple Church of God in Christ do affix our signatures in support and agreement with this herein Complaint filed against Bishop Brandon B. Porter.

Dorothy Nelson 10,9,14 12. Signature Print Name in Lut ps dr. 10, AND MEET 10,10,20,6 14. Signature Date ELEPWOR L. Smith <u>10 | 10 | 20 | 10</u> Date 15 Signature Print Name 10 11012016 16 Signature Print Name Mings 19-10-2016 (FI)1 CDEM 2, 17 Kenneth R. Woodard, 10/10/2016 Signature Paula Kobina 10,10, 2016 19. Print Name Signature MARY S. Fletcher Print Name etchen 10112114 20. Date Beverly Richard 1010, 14 21 Print Name Carris Richarding 10, 14 22. Signature **Print Name**

Official Complaint

We, the undersigned members of Williams Temple Church of God in Christ do affix our signatures in support of agreement with this herein Complaint filed against Bishop Brandon B. Porter.

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Secretary of State

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Statement of Approval

The change specified in this statement has been authorized by the entity in the manner required by the BOC or in the manner required by the law governing the filing entity, as applicable.

Effectiveness of Filing (Select either A, B, or C.)

A. X This document becomes effective when the document is filed by the secretary of state.

B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is:

C. This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is:

The following event or fact will cause the document to take effect in the manner described below:

Execution

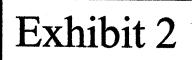
The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized to execute the filing instrument.

Date: 06-13-2016

Signature of authorized person

Brandon B. Porter Printed or typed name of authorized person (see instructions)

"Petition of Removal"



In accordance with our Non-profit 501C3 status and keeping in tune with the legal ramifications of such status; this petition is being addressed to the Chairman of the Trustee Board/Directors of Williams Temple COGIC, Inc. and WTC Development Corp; Chairman Norman G. White and the Board members etal as follows: Dorothy Brice, Tim Allen, Vernon Gatlin, Van Johnson, Melody Cay Rice, Pamela Scott, LaShonda Willis and Cari Barnes. Additionally, a copy is being sent to Bishop Brandon Porter who is the present spiritual head of the said corporations.

We the members of Williams Temple Church of God in Christ, Inc. and WTC Development Corp; petition to remove Cari V. Barnes from all business relations and transactions concerning our corporations Williams Temple COGIC, Inc. and WTC Development Corp. This petition calls for Sis. Barnes' removal from all bank accounts, payroll processing, check signing, as well as any financial duties of data entry of any nature. We further petition that Cari V. Barnes <u>relinquish all financial</u> reports, names and locations of bank accounts, bank and tax statements from 2009 until present along with all documents regarding our real properties and assets. We petition that Sis. Barnes turn over the above stated items and all current and pass due bills, vendor lists etc.; <u>immediately to the finance</u> committee set in place by our current elected Board of Trustees/Directors. We the members feel that this is imperative and will be another positive step toward our church healing and moving forward.

Signed by the following members of both said Corporations:

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"Petition of Removal" 45 90 ł 101 91 92 93 **%** nderson A IX 94 mi 77 50 DHNSO 95 6 94 D 52 tunburs mil , 91 ଷ n50h 98 5 4000 5 99 100 Soules nson P.I 5/ 5 102 A 1 2 D E, 58 54 60 nol. 170 61 AURENCE OFNSON 62 63 orks 61 . 68 69 1891 7Ù 1 an arre Ø 7 Ö n ams U 81 82 L 83 ٠. PR ide もち 84 wen >\\AM 61 eanital particon 88 89 month Prove

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General Assembly Judicial Council Of the CHURCH OF GOD IN CHRIST, INC

ERIC MCADAMS, JOHNNY BRICE,	
VERNON GATLIN, AND VAN JOHNSON	
Complainants,	Case Number:
VS.	
BISHOP BRANDON B. PORTER,	
Respondent	
BISHOP BRANDON B. PORTER,	

Affidavit of Dorothy Brice

State of Texas)	
County of Fort Bend) ss:)	
County of Fort Bona)	

COME NOW the above named individual and affirms the following to be true; I am of legal age and a member of Williams Temple Church of God in Christ, which is part of the Texas Southeast First Ecclesiastical Jurisdiction of the Church of God in Christ, Inc.

I am the Vice Chairman of the duly elected Board of Trustees of Williams Temple Church of God in Christ Inc. My family joined this Church when I was a young child; I received the Baptism of the Holy Ghost many years ago. I was married 50 years ago by Bishop R.E. Woodard Sr. in the original wood frame building, whose space is now occupied by a building we call the Fellowship Hall. My parents, my family, myself, help build this Church along with many other members. As a long standing member of Williams Temple Church, I witnessed a miscarriage of justice and an abuse of power on April 27, 2016 by Bishop Brandon Porter in a general business meeting at Williams Temple and the following is my eyewitness account of the events that occurred.

- 1. During the meeting a member of the Corporation was recognized by Bishop Porter and the member noted these proceedings are not legal
 - a. There was no mention of a vote when the meeting was announced
 - b. The house was not certified. Complete and timely notification of the importance of the meeting had not been given. Note: Bishop Porter ignored both points.
- 2. Bishop Porter presided over the proceeding and he put the motion on the floor to suspend the Trustees.

Note: It was not seconded. Again a member said this is illegal. According to Roberts Rule,

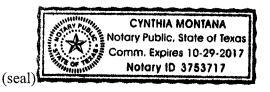
- a. The facilitator cannot put a motion on the floor,
- b. The motion should have come from the floor and
- c. The motion should have been seconded by a member of the corporation and
- d. Bishop is not a member of this Texas Corporation.
- 3. Bishop Porter asked the membership to vote to remove the elected Board of Trustees. He decided to proceed with the voting using a voice vote, yea or nay. Our corporate vote, have always been by counting votes, giving real evidence. The membership cried out against this. Note: A member stood and requested a head count and Bishop Porter ignored both the membership's outcry and that members 'request. Bishop Porter suspended the Board of trustees without a proper vote. I, myself a trustee, asked Bishop Porter again for a head count and the membership agreed, we needed a head count. Bishop Porter "said no" to a head count, and allowed his version to stand. Again the member who complained earlier stood up and told Bishop Porter "all of this is illegal, the entire proceeding is illegal. Bishop Porter ignored the voice of reason and suspended the Board of Trustees on his word, his personal decision.

Further this affiant saith not.

Dorothy Brice October 10, 2014

Affidavit of Dorothy Brice P a g e | 2 State of Texas County of Fort Bend

Before me, a Notary Public, on this day personally appeared DROTHY BUCE known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct.



Notary Public Signature

October 10,2016

Affidavit of Dorothy Brice P a g e | 3 **Business Fundamentals Chk - 3173**



Search transactions	
Available Balance	-\$277.61
Amount Included in Available Balance	
Processing	\$1,145.00
ACH CREDIT GLOBAL PAYMENTS GLOBAL DEP ON 04/12	-\$277.61
04/11/2016 OVERDRAFT ITEM FEE FOR ACTIVITY OF 04-11 CHECK #0000001165 POSTING DATE 04-11-16 POSTING SEQ 00007	- \$35.00 -\$1,422.61
04/11/2016 OVERDRAFT ITEM FEE FOR ACTIVITY OF 04-11 CHECK #0000001164 POSTING DATE 04-11-16 POSTING SEQ 00006	- \$35.00 -\$1,387.61
04/11/2016 OVERDRAFT ITEM FEE FOR ACTIVITY OF 04-11 CHECK #0000001160 POSTING DATE 04-11-16 POSTING SEQ 00005	- \$35.00 -\$1,352.61
04/11/2016	-\$600.00
Check 1165	-\$1,317.61
04/11/2016	- \$650.00
Check 1164	-\$717.61
04/11/2016	-\$685.00
Check 1160	-\$67.61
04/11/2016	- \$259.61
Check 1158	\$617.39
04/11/2016	- \$216.00
Check 1066	\$877.00
04/11/2016	- \$27,000.36
Customer Withdrawal Image	\$1,093.00
04/08/2016	- \$750.00
Check 1156	\$28,093.36
04/08/2016	- \$73.90
Check 1145	\$28,843.36
04/08/2016	- \$99.95
Check 1136	\$28,917.26

Activity	Details	I Want To
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04/07/2016	- \$15.00
ONLINE BUSINESS SUITE ACCT MGMT SERVICES	\$28,977.21
04/07/2016 GUIDEONE MUTUAL DES:INS. PREM. ID:00106139304 INDN:WILLIAMS MEMORIAL TEMP CO ID:1420645088 PPD	- \$336.83 \$28,992.21
04/07/2016	- \$450.00
Check 1161	\$29,329.04
04/07/2016	- \$129.50
Check 1151	\$29,779.04
04/07/2016	- \$66.71
Check 1137	\$29,908.54
04/06/2016	- \$375.00
Check 1162	\$29,975.25
04/06/2016	- \$1,183.00
Check 1159	\$30,350.25
04/06/2016	- \$118.86
Check 1135	\$31,533.25
04/06/2016	\$500.00
Counter Credit	\$31,652.11
04/05/2016	- \$600.00
Check 1152	\$31,152.11
04/05/2016	- \$37.60
Check 1138	\$31,752.11

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Bank of America Name Nombre Williams Temple Curch of God Address In Clinton Temple Curch of God Dirección 252-f Delans St.	No negociable: Se permiten retiros sólo a través de pago al depositario	Date / Fecha 4-11-16 Date / Fecha 4-11-16 Dollars / Dollars / Dollares
★ N° de teléfono (113) 659-6594 ★ Account Number / Número de contractione de contra	uenta ±V1050	X Lux V 12qual Customer Signature / Firma del cliente Total Withdrawal / Retiro total
	740 1 341:	\$ 27000.36

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Online Banking

Business Fundamentals Chk - 3173: Account Activity Transaction Details

Post date:04/13/2016Amount:-500.00Type:WithdrawalDescription:Customer Withdrawal Image

DEBIT 12. Bank of America 🧠 4-13-16 Date ' Fecha or Williams Temple Church of Gud in Chrod 007100 fire churdred a Dollars / 594 Deland St. Tr VISC 6594 # 1007 Account Number / Número de cuenta Total Withdrawal / Retiro total For TX 584036153173 500: \$

1:5407401341:

Exhibit 6



Business Fundamentals Chk - 3173: Account Activity Transaction Details

Post date:	04/13/2016
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Amount: -15,000.00

Type: Withdrawal

Description: Customer Withdrawal Image

1	Not Negotlable - Withdrawals are permitted only through payment to the depositor	Date / Fecha	13-14
Name William Thurch and Charles Charles Address 39.24 Delane St. Director of 24 Delane St. The Markon The 77004 Stelephone No. 113, 1659-6594	fifteen thousand	× (DAL)	Dollars / Dólares
Account Number / Número de ce 3 5 5 5 5 6 0 3 0 1 5 6 5 6 0 3 0 1 5 6 5 6 6 7 6 7 6 7 6 7 8 8 8 7 8 8 8 8 8 8 8 8 8 8 8 8 8	× ×	Custoine Aignuture - Fit Total With	drawal/Retiro total

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Business Fundamentals Chk - 3173: Account Activity Transaction Details

F	Post date:	04/11/2016	
	Amount:	-27,000.36	
	Type:	Withdrawal	
De	scription:	Customer Withdrawal I	mage
Name Williams Runple Curch of God Antheres Williams Runple Curch of God Direction 2524 Delans St. Heuston, TY 77024 Telephone No. (713) 659.6594	N	Acol and 36/100 Dollars 1 X (In V (agrid	
δ Account Number / Number de co 3 5 4 5 5 5 5 5	5	Total Withdrawal / Retiro total \$ 27000.36	

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