

Ronald E. Stidham

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December 24, 2019

Bishop Joel H. Lyle Jr.
General Secretary
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930 Mason Street
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Bishop Lemuel F. Thuston.
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Church of God in Christ, Inc.
1317 E. 12th St.
Kansas City, Missouri 64106
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Elder Peter Davis
Secretary, Judiciary Board
P.O. Box 10141
Birmingham, AL 35202
davispj11@aol.com

**Via Certified and
Electronic Mail**

Greetings,

Enclosed you shall find Complainants Petition of Official Charges pursuant to Article VIII, -
Judiciary Board, Duties, ¶ 10 of the Church of God in Christ Constitution.

I am filing this petition in response to the violations of the Constitution by Bishop Martin L.
Johnson, Bishop Enoch Perry III, and Elder Peter Davis, members of the Judiciary Board of the
Church of God in Christ, Inc.

Sincerely,



Ronald E. Stidham

Encl.

**BEFORE THE
GENERAL ASSEMBLY
JUDICIAL REVIEW COMMITTEE
OF THE
CHURCH OF GOD IN CHRIST, INC.**

RONALD STIDHAM,
COMPLAINANT

VS

BISHOP MARTIN LUTHER JOHNSON ,
BISHOP ENOCH PERRY III,
AND ELDER PETER DAVIS
RESPONDENT(S)

Case Number: _____

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

COMPLAINANTS PETITION OF OFFICIAL CHARGES

Come Now Elder Ronald Stidham hereinafter referred to as the Complainant, a member of First Church of God in Christ, Wichita, Kansas, and files this herein petition against Bishop Martin Luther Johnson, Chairman of the Judiciary Board, Vice Chairman Bishop Enoch Perry III, and the Secretary of the Judiciary Board, Elder Peter Davis, members Judiciary Board of the Church of God in Christ, Inc. with headquarters in Memphis, Tennessee and alleges and states the following;

Bishop Johnson, Bishop Perry, and Elder Peter Davis, hereinafter referred to as the Respondent(s), did violate the rules and regulations of the Constitution of The Church of God in Christ, Inc. as follows:

Introduction

Due to the many egregious violations of Article VIII of the Constitution of the Church of God in Christ this petition is filed.

Just as sin is a transgression of the Word of God, and except the sinner repents, which consist of (a) admission of ones guilt, or (b) being weighed in the balance and found wanting: adjudication, and restoration of what was lost only then is the sin forgiven. So also are violations committed by those in the household of faith.

We must require all violations of Article VIII and the Judicial Canon especially violations committed by those elected to the branch of our government tasked with protecting the rights of *every* church member, to be similarly adjudicated.

The establishment of the Judiciary Board shall assure that the legitimately aggrieved members of the Church of God in Christ, Inc. are heard, that fairness prevails throughout the brotherhood, and that equal protection and due process are and continue to be the right of every Church member.

Article VIII, Preamble

STANDING

Standing, A party's right to make a legal claim or seek judicial enforcement of a duty or right.
(*Black's Law 9th Edition*)

The question of who has standing is established by statute found in the Church of God in Christ Constitution, Article VIII—Judiciary Board, Term of Office, 3 (B) (1)

A delegate in good standing of the Church of God in Christ having just cause to believe that a member of the Judiciary Board has committed an act repugnant to the Constitution of the Church of God in Christ may file a charge.

The *only* requirement, as seen on the face of the document, is **"A delegate in good standing...having just cause to believe...may file a charge."** Just as the bible tells us,

"...If any man shall add unto these things, God shall add unto him the plagues that are written in this book: And if any man shall take away from the words of the book of this prophecy, God shall take away his part out of the book of life,..." (Revelation 22:18-19)

For an elected official or justice to commit acts which violate the Constitution is an act against each and every member of the Church of God in Christ.

Pursuant to Article VIII, Term of Office, paragraph 3(B) (1), as a delegate in good standing, I file the following petition and charges.

Statement of Facts

In January 2017, the Pastor and members of Greater Love Church of God in Christ, initiated the procedures found in Article III, Part II, Section D, paragraph 18 to transfer to Tennessee Eastern 1st in which Bishop Felton Smith is the jurisdictional bishop. In February, they completed the required provisions found in the above mentioned statute and sent Bishop Lyles the required letter according to the above-mentioned Article. Pastor Michael Cummings made his reports through Tennessee Eastern 1st for the years 2017, 2018, and 2019.

After repeated attempts to obtain his credentials to no avail, on or about October 8, 2019, Pastor Cummings filed a petition with the Judiciary Board by certified and electronic mail sent to the General Secretary, Bishop Joel Lyles and the Judiciary Board Secretary, Justice Peter Davis. On October 11, 2019, the Judiciary Board issued an order, which stated his petition had been;

“ORDERED AND ADJUDGED by the Court as follows: This matter is hereby transferred to the General Council of Pastors and Elders.”

There are several substantive problems with this Order, including the following:

- The Judiciary Board does not provide any justification or rationale for its decision;
- Transferring a matter to a lower court with no instructions to the lower court, as opposed to “remanding” it, is not an appropriate remedy; and
- The Judiciary Board completely ignored the Constitutional issues presented in this case, which does give a Petitioner the right to appeal directly to the Judiciary Board

I am in possession of a “Dissenting Order” which finds the court did not hear the case nor were the majority of the justices even aware of the petition or the order until October 12, ***the day after the order was issued.***

I cannot comprehend how the Chairman, the Secretary, could commit such an act of deceit and fraud without consulting the Vice Chairman. I believe as the only other court officer, Vice-Chairman, Bishop Enoch Perry III was also aware of, and was possibly a co-conspirator to this order.

I am also aware; this is at least, the second time this type of behavior has taken place with these current court officers.

I believe it best to let the Dissenting Order¹ speak for itself:

FROM THE DISSENTING ORDER

ANALYSIS

A. The Cummings Order is a False and Improperly Published Order.

The Cummings Order is a product of misrepresentation and has been improperly issued. The Judiciary Board functions as the highest “Court” in the International Church of God in Christ, Inc. and consists of nine (9) Justices. Those nine Justices are elected and must vote on any official “Order” issued by the Court.

The Chief Justice and Secretary interfered with this process, and in doing so, obstructed justice. Specifically, the Chief Justice and Secretary acted in concert with one another to conceal and issue an official order of the Judiciary Board without ever consulting, discussing or voting on the Cummings matter. Even worse, in issuing the Cummings Order, they represented that the entire Judiciary Board had deliberated and voted on the outcome. This is false.

As the attached Exhibits and above email documentation confirms, several days after issuing the Cummings Order, the Chief Justice and Secretary attempted to solicit the opinion and vote of the other seven (7) Justices, and thereby, conceal that they had already decided and published an order that no other Justice knew about. This attempt was made more than four (4) days after they had already decided and issued the Cummings Order. In other words, it appears to be a token attempt to either cover their tracks or justify their illicit actions.

B. The Actions of the Chief Justice and Secretary Appear to be Willful and Deceitful.

The Chief Justice and Secretary appear to have taken actions to willfully and deceitfully cover their tracks in unilaterally issuing and publishing the Cummings Order.

¹ Complainants Exhibit 1

The above documented attempt to solicit a blind discussion and vote of the Judiciary Board by e-mail, rather than meeting, combined with an altered Official pleading provided by Secretary Peter Davis with the date redacted, lends itself to a presumption that there was a blatant attempt by one or both of these Judicial Officers to cover their tracks.

Specifically, the original pleading by Petitioner Cummings has a date on it. The pleading provided to the Judiciary Board in PDF form by Justice Davis does not have a date on it. To be clear, this means that someone took the time to either print or convert a PDF document, alter it, re-scan it in back into PDF format, then send the pleading to the rest of the Judiciary Board for consideration after the matter had already been decided by the Chief Justice and Secretary.

Moreover, consider the following statement made by Chief Justice Johnson in his email to the Judiciary Board:

“I deemed it proper to have input from each Justice as to the court of first instance. Your input is equally important and proper. The disposition of the matter will be a majority JB opinion.” (Email from Chief Justice Johnson, October 13, 2019.)

This is deceitful. The Chief Justice even admits that input from each justice is been “proper”. This pronouncement, combined with the statement above on October 13th that “disposition of the matter will be a majority JB opinion” appears to be a deliberate attempt to lead the Judiciary Board into the false belief that the matter was still pending.

This is overwhelming circumstantial evidence of deceit and dishonesty which must be explained. Documents and correspondence have apparently been altered, withheld and falsified. The Judiciary Board was misled. The lower court (GCPE) were misled. The Petitioners were misled. The Church was misled. This is unacceptable. This is a call for accountability.

C. Chief Justice Martin Luther Johnson has conceded and admitted to the Judiciary Board that the Cummings Order was improperly adjudicated and issued by himself and Secretary Peter Davis.

On November 11th, in an official meeting of the Judiciary Board at the Convocation in St. Louis, Chief Justice Johnson conceded that he and Secretary Davis wrongfully issued the Cummings order. At the same time, Secretary Peter Davis remained steadfast and maintained he had every right to issue an official Order of the Judiciary Board without a vote, deliberation or discussion as was done in this instance.

The Bible encourages us to confess our sins and to forgive one another. This is good. I forgive both Chief Justice Bishop Martin Luther Johnson and Secretary Peter Davis, in and with the utmost of sincerity, whether they admit to wrongdoing or not. While this confession is medicine and a remedy for the soul, the consequences of the wrongdoing must be dealt with. The actions by the Chief Justice and Secretary after the wrongdoing amount to “fig leaves”.

The General Assembly elected this Board with confidence in our respective pledges to act with wisdom, integrity and to abide by the Constitution of the Church of God in Christ. The Cummings Order is improper, false, and deceitful. In all likelihood, it may very well be that Petitioner Cummings has filed a petition that is not appropriately before the Judiciary Board. However, the Judiciary Board was deprived by the Chief Justice and Secretary of the opportunity to make this decision, and the Petitioner, as well as the Church, was deprived of an honest, just, and deliberate decision. We must be faithful ourselves in the procedural and ethical standards by which we judge others.

D. Violations of Multiple Rules of Ethics & Professional Conduct.

The disposition of this case is in violation of the Federal Rules of Professional Conduct, the American Bar Association Canons of ethics, applicable State Codes of Professional Conduct for attorneys and judges, and the Church of God in Christ Judicial Code of Conduct, an addendum to the Constitution of the Church of God in Christ (Article VIII).

Specifically, it is grounds for discipline and possible disbarment for any attorney or judge in any forum to:

- Engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;*
- Engage in conduct that is prejudicial to the administration of justice*
- Knowingly assisting or inducing another to do so, or to do so through the acts of another; ...*

See, Model Rules of Professional Conduct for the American Bar Association.

I am fearful that the actions of this Board have the potential to preclude me from ever engaging in the practice of law in any state if I remain silent or idle in witness of fraud and obstruction in the dispensation of justice. Equally disturbing and of concern for every member of this Board and Church leadership, including the non-lawyers acting in a judicial capacity, is that the ethical violations of the two individuals on this Board carry potential civil liability for those who participate actively or passively in the wrongdoing. There is legal precedent for such in civil causes of action. The errors outlined, and some that are not disclosed here, are clear ethical and procedural violations under any religious or secular code of ethics and professional conduct.

If the dispensation of the Cummings Order was an intentional act by the Chief Justice and Secretary, then the order is fraudulent. If dispensation was not intentional, then its issuance amounts to profound negligence and reflects a fundamental misunderstanding of the function of an appellate court and the role of the Judiciary Board in this church.

For these acts which are repugnant to the Constitution of the Church of God in Christ, I hereby submit the following charges against Respondents Bishop Martin L. Johnson, Bishop Enoch Perry III, and Justice Peter Davis.

Brief of Complainant

COUNT I

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 6th Edition}

All nine seats on the Judiciary Board are currently filled, therefore Article VIII, Quorum states:

Seven (7) members shall constitute a quorum. An affirmative vote of all members of the Board shall be necessary to declare any act of the General Assembly unconstitutional. On other matters, a majority vote of the Board will be sufficient.

Article VIII clearly states, a majority vote of the minimum seven (7) members is required on matters other than an act of the General Assembly. The Chief Justice and the Secretary were aware of this rule, each of them were members of the Judiciary Board when Chairman James Hunt challenged the operation of the Judiciary Board under former Chief Justice, Thomas Jackson.

By issuing an order claiming to have been “ORDERED AND ADJUDGED by the Court...” Respondents committed an act of deceit and fraud, a clear violation of Article VIII of the Church of God in Christ Constitution.

This willful violation of Article VIII is an act of Malfeasance.

COUNT II

VIOLATION OF THE JUDICIAL CANON 1

UPHOLD THE INTEGRITY AND INDEPENDENCE OF THE JUDICIARY BOARD

A justice should uphold the integrity and independence of the judiciary:

An independent and honorable judiciary is indispensable to justice in The Church of God in Christ. A justice should participate in establishing, maintaining, and enforcing, and should himself/herself observe, high standards of conduct so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

Respondents have undermined the integrity of the Judiciary Board, with a constant barrage of actions, which have culminated with this latest “Order”, which contains a blatant lie. This petition was not presented, adjudicated, or discussed by the Judiciary Board before the “Order” was issued and circulated to various members of COGIC leaders. Then in an apparent “uh oh” moment, they attempted to cover their deceit which resulted in act of fraud perpetrated on the members of the Judiciary Board, the General Assembly, Complainant and entirety of the Church of God in Christ By attempting to have the other justices “affirm” an order which they had not seen, which would have caused the other justices to violate the Constitution compounds the violation.

When the Chief Justice, the Secretary and perhaps the Vice-Chairman perpetuate this type of deceit and fraud, the integrity of the court collapses and the reputation of each and every justice who participates in the COGIC judicial system, have been tainted by the actions of these justices.

COUNT III

VIOLATION OF THE JUDICIAL CANON 2 (A)

AVOID THE APPEARANCE OF IMPROPRIETY

A justice should avoid impropriety and the appearance of impropriety in all his/her activities:

- A. *A justice should respect and comply with the Church's constitution, amendments, by-Laws, and all appendices thereto and should conduct himself/herself at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.*

Respondents have shown a clear disrespect for the Church’s constitution, and amendments. On multiple occasions, they have failed to conduct themselves in a manner that promotes public confidence in both the impartiality and integrity of the Judiciary Board. Respondent’s actions call into question the honesty, integrity and impartiality of each member of the COGIC judicial system. If the Supreme Court is this corrupt, how can the lower courts operate differently, can the integrity of the lower courts surpass that of the Supreme Court? The Word of God instructs us to: “*Abstain from all appearances of evil*” 1 Thessalonians 5:22, this is a violation of the Holy Scripture, which our preamble states; *We, the members of the Church Of God In Christ, hold the Holy*

Scriptures as contained in the Old and New Testaments of our Bible as our rule of Faith and Practice.
Respondents failed to adhere to the Judicial Canon, and the Holy Scripture.

COUNT IV

VIOLATION OF ARTICLE VIII;

ORGANIZATION AND PROCEDURE 1 (A)

The chairman shall preside over all judicatory sessions. He shall also assign the task of writing the findings of facts and conclusions of law to one or more Judiciary Board members, or he may elect to write the facts and conclusions of law himself.

The Chairman is tasked with the responsibility of writing findings of facts and conclusions of law that provide rationale for the decisions of the Judiciary Board, and direction for complainants now and in the future. Respondents have violated this Constitutional provision. If they had simply followed their own procedures and submitted the case to the entire Judiciary Board, I am hopeful that at least one of the Justices would have recognized or done enough due diligence to determine there are Constitutional issues present which provide a direct right to appeal to the Judiciary Board.

There are legal concepts related to Constitutional provisions that have an impact on this case, including questions concerning:

- Whether the duties of the General Secretary are administrative or qualitative in nature;
- Whether a Bishop can rightfully bring an action against a Pastor that must constitutionally commence with the congregation of that church;
- Legal Jurisdiction of one COGIC jurisdiction to bring an action against a church in a different COGIC jurisdiction; and
- The impact of a wrongfully filed lawsuit filed by a Bishop in civil court has on a legal matter in our COGIC court system

These are complex legal issues that require attention by legally engaged and sharp minds. The current leadership of the Judiciary Board, by this fraudulent Judicial Order, has demonstrated that it is unfit to resolve or adjudicate these issues. There is NO CONFIDENCE in the leadership and administration of this Judiciary Board.

COUNT V

VIOLATION OF JUDICIAL CANON 3 B (3)

A justice should take or initiate appropriate disciplinary measures against a justice or lawyer for unprofessional conduct of which the justice may become aware.

Commentary

Disciplinary measures may include reporting a justice's or lawyer's misconduct to an appropriate disciplinary body.

Justices' are required to initiate disciplinary measures against any justice for unprofessional conduct when they become aware of it. When any justice to fail to do so, He/she is in violation of Article VIII, Judicial Code, an addendum to the constitution.

Prayer of the Petition

Petitioner, for the reasons set forth above, hereby requests the following relief:

- 1) Removal by Impeachment of both Chairman Martin L. Johnson and Elder Peter Davis from the Judiciary Board for malfeasance, fraud and deceptive practices in the performance of their administrative and Constitutional duties;
- 2) Removal by Impeachment of the officers of the Judiciary Board - Chairman Martin L. Johnson, Vice Chair Enoch Perry, and Elder Peter Davis from the Judiciary Board for a justice should uphold the integrity and independence of the judiciary;
- 3) Removal by Impeachment of the officers of the Judiciary Board - Chairman Martin L. Johnson, Vice Chair Enoch Perry, and Elder Peter Davis from the Judiciary Board for comply and uphold the Church's constitution, amendments, by-Laws and mandatory procedures; and
- 4) Removal by Impeachment of the officers of the Judiciary Board - Chairman Martin L. Johnson, Vice Chair Enoch Perry, and Elder Peter Davis from the Judiciary Board for collusion, deceit and illicit conduct intended to deprive Petitioner of his right to fair consideration and due process as provided by Article VIII of the Constitution of the Church of God in Christ, Inc.

I Ronald Stidham, Complainant, a member of the Church of God in Christ, Inc., as Complainant in the above and foregoing Petition, affirm that the statements and allegations contained herein are true, and correct on this Tuesday, December 24, 2019.



Ronald E. Stidham
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**JUDICIARY BOARD OF THE CHURCH OF GOD IN CHRIST****DISSENTING OPINION OF
JUSTICE JONATHAN SAFFOLD, JR.
FROM JUDICIAL ORDER TRANSFERRING CUMMINGS CASE**

This Dissenting Opinion is hereby respectfully submitted in opposition to the “Final Order in The Matter of Greater Love Church of God in Christ, Inc., Pastor Michael J. Cummings” (hereafter “the Cummings Order”). The basis for this Dissenting Opinion to the above referenced Order is as follows:

- The Cummings Order falsely states and represents that it “came before the Judiciary Board”;
- The Cummings Order falsely states and represents that it was “adjudicated” by the Judiciary Board”;
- Chief Justice Martin Luther Johnson has conceded and admitted to the Judiciary Board that the Cummings Order was improperly adjudicated and issued by himself and Secretary Peter Davis;
- The handling and disposition of the Cummings Order is a clear ethical violation of the Federal Rules of Professional Conduct for attorneys and judges, the American Bar Association Canons of Ethics, and applicable State Codes of Professional Conduct for attorneys and judges; and
- The Cummings Order provides an inappropriate remedy.

FACTUAL BACKGROUND

On or about October 11, 2019, Chief Justice Martin L. Johnson and Secretary Peter Davis, acting together in concert, both signed and issued an official order of the Judiciary Board, representing that the above referenced Cummings Petition “came before the Judiciary Board and was “adjudicated” by the judiciary Board.

This petition was never presented, adjudicated or even discussed by the Judiciary Board prior to the issuance of the Cummings Order by the Chief Justice and Secretary. In fact, as of the date of the filing of this Dissent, an Official copy of the Cummings Order has yet to be presented to the Judiciary Board by the Chief Justice or Secretary.

I became aware that there was an official Order issued by the Judiciary Board through third parties who had received and read the order, as it was widely distributed to the following individuals, but NEVER distributed to, or discussed with, the Judiciary Board itself:

- Bishop J. H. Lyles, General Secretary COGIC
- Bishop L. F. Thuston, Chairman, General Assembly
- Bishop James M. Scott, Jurisdictional Bishop, TN. Eastern 2nd
- Bishop Felton M. Smith, Jurisdictional Bishop, TN. Eastern 1
- Superintendent Michael Eaddy, Chairman, General Council of Pastors and Elders
- Pastor Michael Cummings

Alternatively stated, all of the above listed individuals received a copy of an order that no one on the Judiciary Board other than the Chief Justice and Secretary had seen, drafted, discussed or had knowledge thereof.

On October 12th and 13th, after the Cummings Order was issued and put into circulation by the Chief Justice and Secretary, Secretary Peter Davis sent the email attached hereto as Exhibit 2, soliciting following input from the Judiciary Board:

From Secretary Peter Davis (October 12; 9:57 AM)

Dear Justices:

Please review the email concerning Pastor Michael Cummings...Please indicate your affirmation of this position; or if you would like for the board to hear matter; or if you want to sustain said position.

Regards,

From: Secretary Peter Davis; (Sat. Oct. 12; 8:53 AM)

"Good Morning Justices.

Per Chief Justice's directive, please review the attachment and confer with him your position on this matter no later than Tuesday, October 15."

In response to this email request and because the documents appeared to be altered and/or tampered, I responded with an email to Secretary Davis and the following exchange took place between myself and Secretary Peter Davis:

From: Justice Saffold (Oct. 13th; 12:43 PM)

Justice Davis, I have two questions concerning this petition. First, on what date did you receive this petition? Second, when you received it, did the cover letter have a date on it?

From: Secretary Peter Davis (Sun. Oct. 13th; 4:15 PM)

Justice Saffold:

It appears you're the only one who need additional instructions. To that end, feel free to contact the Chief Justice...via any means you desire.

From: Justice Saffold (Oct. 13th; 4:23 PM)

Thank you justice Davis. I will do so.

Nonetheless, if anyone else has the clarity that I'm looking for, please feel free to reach out and explain to me the process that appears to be obvious to everyone else. I certainly don't want to unnecessarily trouble the Chief Justice with something that is so nominal.

Specifically, is this a blind vote? Do we explain our rationale in our writing? Are we able to know how anyone else voted and their rationale? Will this be discussed in a meeting?

Thanks in advance to anyone who can bring me up to speed.

From Chief Justice Johnson; (Oct. 13th)

Dear Justices:

This communique is my attempt to further clarify what I had in mind when I directed the JB Secretary to provide each Justice with a copy of the Cumming/Scott Petition. While I have an idea of how and which Court has first instance as to the Petition, I deemed it proper to have input from each Justice as to the court of first instance. Your input is equally important and proper. The disposition of the matter will be a majority JB opinion. I have directed the Secretary to forward to each Justice just as I wrote it.

Sincerely,

/s/Martin L. Johnson

Bishop Martin L. Johnson,

After no discussion or mention of the matter for over a month, on November 11th in an official meeting of the Judiciary Board with all nine Justices in attendance, with no other alternatives available in light of the clear paper trail and sequence of events, Chief Justice Johnson conceded that he and Secretary Davis wrongfully issued the Cummings Order.

ANALYSIS

A. The Cummings Order is a False and Improperly Published Order.

The Cummings Order is a product of misrepresentation and has been improperly issued. The Judiciary Board functions as the highest “Court” in the International Church of God in Christ, Inc. and consists of nine (9) Justices. Those nine Justices are elected and must vote on any official “Order” issued by the Court.

The Chief Justice and Secretary interfered with this process, and in doing so, obstructed justice. Specifically, the Chief Justice and Secretary acted in concert with one another to conceal and issue an official order of the Judiciary Board without ever consulting, discussing or voting on the Cummings matter. Even worse, in issuing the Cummings Order, they represented that the entire Judiciary Board had deliberated and voted on the outcome. This is false.

As the attached Exhibits and above email documentation confirms, several days after issuing the Cummings Order, the Chief Justice and Secretary attempted to solicit the opinion and vote of the other seven (7) Justices, and thereby, conceal that they had already decided and published an order that no other Justice knew about. This attempt was made more than four (4) days after they had already decided and issued the Cummings Order. In other words, it appears to be a token attempt to either cover their tracks or justify their illegal actions.

B. The Actions of the Chief Justice and Secretary Appear to be Willful and Deceitful.

The Chief Justice and Secretary appear to have taken actions to willfully and deceitfully cover their tracks in unilaterally issuing and publishing the Cummings Order.

The above documented attempt to solicit a blind discussion and vote of the Judiciary Board by e-mail, rather than meeting, combined with an altered Official pleading provided by Secretary Peter Davis with the date redacted, lends itself to a presumption that there was a blatant attempt by one or both of these Judicial officers to cover their tracks.

Specifically, the original pleading by Petitioner Cummings has a date on it. The pleading provided to the Judiciary Board in PDF form by Justice Davis does not have a date on it. To be clear, this means that someone took the time to either print or convert a PDF document, alter it, re-scan it in back into PDF format, then send the pleading to the rest of the Judiciary Board for consideration after the matter had already been decided by the Chief Justice and Secretary.

This is circumstantial evidence of deceit and dishonesty, which must be explained. How can any entity with a unique responsibility as sensitive of that of the Judiciary Board to dispense justice appropriately function when documents and correspondence that form the life blood of its duties are falsified and altered?

C. Chief Justice Martin Luther Johnson has conceded and admitted to the Judiciary Board that the Cummings Order was improperly adjudicated and issued by himself and Secretary Peter Davis.

On November 11th, in an official meeting of the Judiciary Board at the Convocation in St. Louis, Chief Justice Johnson conceded that he and Secretary Davis wrongfully issued the Cummings order. At the same time, Secretary Peter Davis remained steadfast and maintained he had every right to issue an official Order of the Judiciary Board without a vote, deliberation or discussion as was done in this instance.

The Bible encourages us to confess our sins and to forgive one another. This is good. I forgive both Chief Justice Bishop Martin Luther Johnson and Secretary Peter Davis, in and with the utmost of sincerity, whether they admit to wrongdoing or not. While this confession is medicine and a remedy for the soul, the consequences of the wrongdoing must be dealt with. The actions by the Chief Justice and Secretary after the wrongdoing amount to “fig leaves”.

The General Assembly elected this Board with confidence in our respective pledges to act with wisdom, integrity and to abide by the Constitution of the Church of God in Christ. The

Cummings Order is improper, false, and deceitful. In all likelihood, it may very well be that Petitioner Cummings has filed a petition that is not appropriately before the Judiciary Board. However, the Judiciary Board was deprived by the Chief Justice and Secretary of the opportunity to make this decision, and the Petitioner, as well as the Church, was deprived of an honest, just, and deliberate decision. We must be better than this. We must do better than this.

D. Violations of Multiple Rules of Ethics & Professional Conduct.

The disposition of this case is in violation of the Federal Rules of Professional Conduct, the American Bar Association Canons of ethics, applicable State Codes of Professional Conduct for attorneys and judges, and the Church of God in Christ Judicial Code of Conduct, an addendum to the Constitution of the Church of God in Christ (Article VIII).

Specifically, it is grounds for discipline and possible disbarment for any attorney or judge in any forum to:

- Engage in conduct involving dishonesty, fraud, deceit, or misrepresentation;
- Engage in conduct that is prejudicial to the administration of justice
- Knowingly assisting or inducing another to do so, or to do so through the acts of another; ...

See, Model Rules of Professional Conduct for the American Bar Association.

I am fearful that the actions of this Board, many of which amount to clear ethical and procedural violations under any religious or secular code of ethics and professional conduct, have the potential to preclude me from ever engaging in the practice of law in any state if I remain silent or idle in witness of fraud and obstruction in the dispensation of justice. Even more disturbing and of concern for every member of this Board and Church leadership, including the non-lawyers acting in a judicial capacity, is that the ethical violations of the two individuals on this Board carry potential civil liability for those who participate actively or passively in the wrong-doing. There is legal precedent for such civil causes of action.

I took an oath more than twenty-five (25) years ago that I would not engage in conduct in any forum that is illegal, unethical or that is prejudicial to the administration of justice. I took a similar oath approximately one year ago when sworn onto the Judiciary Board. This is unfortunately, another, in what seems to be a continuing cycle of injustice being dispensed by the leadership of this Court.

If the dispensation of the Cummings Order was an intentional act by the Chief Justice and Secretary, then the order is fraudulent. If dispensation was not intentional, then its issuance amounts to profound negligence and reflects a fundamental misunderstanding of the function and profound role of the Judiciary Board in this church.

CONCLUSION

An appropriate remedy in this situation is extremely difficult to determine because of the inexplicable and extreme nature of the malfeasance by the Chief Justice and Secretary.

Nonetheless, in the interests of justice and due process, the Cummings Petition must be examined again, with all relevant information at hand provided to each member of the Judiciary Board, then voted on by the entire Judiciary Board. Contingent upon the final vote, a clear and unambiguous Order must be drafted with some level of instruction (not advice) to the Petitioner.

An Order should never be “transferred” from the court of final appellate authority. (Note: It can be transferred to the Supreme Court.).

Justice Jonathan Saffold, Jr.

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

IN THE MATTER OF GREATER LOVE)
CHURCH OF GOD IN CHRIST, INC.;)
PASTOR MICHAEL CUMMINGS))
)
)
)
)

Reference No.: 2019-GL

ORDER

This matter came on before the Judiciary Board on the Petition for Review filed by the Petitioner, Pastor Michael Cummings on, 10/08/2019. This Court on its own Motion hereby transfer this matter to the court of appropriate jurisdiction. Accordingly, it is

ORDERED AND ADJUDGED by the Court as follows:

This matter is hereby transferred to the General Council of Pastors and Elders.

DONE this 11th day of October, 2019.

/s/ Bishop Martin Luther Johnson

Bishop Martin L. Johnson, Chief Justice

/s/ Elder Peter J. Davis

Justice Elder Peter J. Davis, Secretary

CC: Bishop J. H. Lyles, General Secretary COGIC

jlyles@cogic.org; lwilkins@cogic.org (via email)

Bishop L. F. Thuston, Chairman, General Assembly COGIC (via email)

Bishop James M. Scott, Jurisdictional Bishop, TN. Eastern 2nd (via email)

Bishop Felton M. Smith, Jurisdictional Bishop, TN. Eastern 1 (via email)

Superintendent Michael Eaddy, Chairman, General Council of Pastors and Elders (via email)

Pastor Michael Cummings (via email)



Greater Love Cogic/Pastor Michael Cummings

Peter J. Davis <davispj11@aol.com>

Sat, Oct 12, 2019 at 9:57 AM

To: mjohn2814 <mjohn2814@aol.com>, Enoch Perry <ep3jdb2@gmail.com>, "Peter J. Davis, Esq." <davispj11@aol.com>, Carl King <cking46842@aol.com>, drdianabanks@gmail.com, justice.integrity.connor@gmail.com, vslack@yahoo.com, motherjudge1@gmail.com, justicejsaffold@gmail.com

Dear Justices:

Please review the email concerning Pastor Michael Cummings. It has come to our attention that this matter has come before the GCPE, and they have not made a determination. Therefore, it would be inappropriate for the Judiciary Board to hear this matter prior to the ecclesiastical appellate process being exhausted.

This matter may very well come to our board, if a resolution is not achieved.

It is our belief that affirming the Petitioner to exhaust his constitutional appellate rights prior to appealing to our board would be proper and appropriate. Please indicate your affirmation of this position; or if you would like for the board to hear matter; or if you want to sustain said position.

Regards,

Pjd

Peter J. Davis, Esq.



12/14/2019, 5:27 PM

Greater Love Judiciary Board Complaint - COMBINED - 10-8-19-2019.pdf

Peter J. Davis <davispj11@aol.com>

Sat, Oct 12, 2019 at 8:53 AM

To: Enoch Perry <ep3jdb2@gmail.com>, Justice Diana Banks <drdianabanks@gmail.com>, Bishop Charles E Connor <justice.integrity.connor@gmail.com>, Casandra Lewis <motherjudge1@gmail.com>, Carl King <cking46842@aol.com>, Justice Valda Slack <vslack@yahoo.com>, "Jonathan Saffold, Jr., Esq." <justicejsaffold@gmail.com>
Cc: mjohn2814@aol.com

Good Morning Justices.

Per Chief Justice's directive, please review the attachment and confer with him your position on this matter no later than Tuesday, October 15.

Regards
Pjd

Peter J. Davis, Esq.



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Greater Love Judiciary Board Complaint - COMBINED - 10-8-19-2019.pdf

Jonathan Saffold <justicejsaffold@gmail.com>

Sun, Oct 13, 2019 at 12:40 PM

To: "Justice Peter J. Davis" <davispj11@aol.com>

Cc: Enoch Perry III <ep3JdB2@gmail.com>, Diana Banks <drdianabanks@gmail.com>, Bishop Charles E Connor <justice.integrity.connor@gmail.com>, Casandra Lewis <motherjudge1@gmail.com>, Carl King <cking46842@aol.com>, Justice Valda Slack <vslack@yahoo.com>, mjohn2814@aol.com

When you state "confer" with Chief Justice, what exactly does that mean?

Call him? Write him? What specifically is requested of us and what will be your deliberative process?

[Quoted text hidden]

[Quoted text hidden]

Peter J. Davis, Esq.



Greater Love Judiciary Board Complaint - COMBINED - 10-8-19-2019.pdf

Peter J. Davis <davispj11@aol.com>

Sun, Oct 13, 2019 at 4:12 PM

To: Jonathan Saffold <justicejsaffold@gmail.com>

Cc: Enoch Perry III <ep3JdB2@gmail.com>, Diana Banks <drdianabanks@gmail.com>, Bishop Charles E Connor <justice.integrity.connor@gmail.com>, Casandra Lewis <motherjudge1@gmail.com>, Carl King <cking46842@aol.com>, Justice Valda Slack <vslack@yahoo.com>, MJohn2814@aol.com

Justice Saffold:

It appears you're the only one who need additional instructions. To that end, feel free to contact the Chief Justice...via any means you desire.

Peter J. Davis, Esq.

On Oct 13, 2019, at 3:10 PM, Jonathan Saffold <justicejsaffold@gmail.com> wrote:

[Quoted text hidden]



Jonathan Saffold <justicejsaffold@gmail.com>

Greater Love Judiciary Board Complaint - COMBINED - 10-8-19-2019.pdf

Jonathan Saffold <justicejsaffold@gmail.com>

Sun, Oct 13, 2019 at 4:23 PM

To: "Justice Peter J. Davis" <davispj11@aol.com>

Cc: Enoch Perry III <ep3JdB2@gmail.com>, Diana Banks <drdianabanks@gmail.com>, Bishop Charles E Connor <justice.integrity.connor@gmail.com>, Casandra Lewis <motherjudge1@gmail.com>, Carl King <cking46842@aol.com>, Justice Valda Slack <vslack@yahoo.com>, MJohn2814@aol.com

Thank you justice Davis. I will do so.

Nonetheless, if anyone else has the clarity that I'm looking for, please feel free to reach out and explain to me the process that appears to be obvious to everyone else. I certainly don't want to unnecessarily trouble the Chief Justice with something that is so nominal.

Specifically, is this a blind vote? Do we explain our rationale in our writing? Are we able to know how anyone else voted and their rationale? Will this be discussed in a meeting?

Thanks in advance to anyone who can bring me up to speed.

JS

[Quoted text hidden]

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

IN THE MATTER OF GREATER LOVE)
CHURCH OF GOD IN CHRIST, INC.;)
PASTOR MICHAEL CUMMINGS))
)
)
)
)

Reference No.: 2019-GL

ORDER

This matter came on before the Judiciary Board on the Petition for Review filed by the Petitioner, Pastor Michael Cummings on, 10/08/2019. This Court on its own Motion hereby transfer this matter to the court of appropriate jurisdiction. Accordingly, it is

ORDERED AND ADJUDGED by the Court as follows:

This matter is hereby transferred to the General Council of Pastors and Elders.

DONE this 11th day of October, 2019.

/s/ Bishop Martin Luther Johnson

Bishop Martin L. Johnson, Chief Justice

/s/ Elder Peter J. Davis

Justice Elder Peter J. Davis, Secretary

CC: Bishop J. H. Lyles, General Secretary COGIC

jlyles@cogic.org; lwilkins@cogic.org (via email)

Bishop L. F. Thuston, Chairman, General Assembly COGIC via email)

Bishop James M. Scott, Jurisdictional Bishop, TN. Eastern 2nd (via email)

Bishop Felton M. Smith, Jurisdictional Bishop, TN. Eastern 1 (via email)

Superintendent Michael Eaddy, Chairman, General Council of Pastors and Elders (via email)

Pastor Michael Cummings (via email)