

**BEFORE THE BOARD OF BISHOPS
CHURCH OF GOD IN CHRIST, IN
CHAIRMAN, ALBERT GALBRAITH**

**IN RE BISHOP WILLIE C. GREEN
(CASE NOS. 2022-WG-0822 & 2022-WG-1020)**

STATEMENT OF ALLEGED VIOLATION

PROCEDURAL HISTORY

1. This Statement of Alleged Violations involves two separate charges brought by several different individuals against Bishop Willie C. Green (“Respondent”), Jurisdictional Prelate of the Ecclesiastical Jurisdiction Florida Northwest pursuant to the provisions of Article VIII, §D of the Church of God in Christ Constitution (“COGIC Constitution”).

2. On or about March 20, 2022, Bishop William H. Watson, III, then the Secretary of the Board of Bishops, received charges from Superintendent U.L Johnson, Superintendent Walter Miller, Elder Michael Banks, and Elder Arthur Orr (collectively “Johnson Complainants”) against Respondent.

3. The Johnson Complainants advance several charges against Respondent, which include allegations that Respondent: (a) Count I -- failed to abide by the rules and regulations of the Church of God in Christ when he of his own accord initiated, authenticated, and sustained charges against pastors; and when he also, without following Church of God in Christ protocol or having just-cause, suspended pastors and declared pulpits vacant, (Article VIII, §D, ¶1(a)); (b) Count II – engaged in malfeasance by, among other things, (i) forming a not-for-profit corporation with the intent to commit fraud and deceive the jurisdiction, the national church and the court; (ii) filing civil charges against Westside Ministry, Inc.¹, Pastor Kenneth Watts, Frankie Huff, and Coston Huff on behalf of the Church of God in Christ, Inc. without authorization from the General Counsel, Presiding Bishop, or the General Assembly; (iii) changing the locks of the Westside Ministry properties effectively locking out Pastor Watts and Pastor Nesbitt from the premises; and (iv) threatening to bring both criminal and civil charges against Pastor Elvis Piggott for behaviors Respondent believed to be unbecoming to a Church of God in Christ leader (Article VIII, §D, ¶1(b))²; and (c) Count III – engaged in conduct unbecoming a Bishop by

¹ The names West Side Ministry, Westside Ministry, Inc., and West Side Church of God in Christ of Escambia, Inc. (collectively referenced at “Westside Ministry”) are used interchangeably throughout the complaints and associated exhibits but all of these names refer to the same entity, the local Church of God in Christ congregation located at both 51 Marshall Ln, Pensacola, Florida and 2313 N. G. Street, Pensacola, Florida, respectively.

² The Johnson Complainants allege that Respondent engaged in additional acts that they contend constitute malfeasance. Time and resources will not permit the Grievance Committee to discuss every factual allegation. As such, the Grievance Committee will only address a particular factual statement to the extent it is relevant to the just cause determination of the particular Count being considered.

failing to display characteristics that the Word of God and the COGIC Constitution demand; and by making false claims and accusations against certain brethren, while simultaneously ignoring similar actions committed by others (Article VIII, §D, ¶1(h) (“Johnson Complaint ”)).³

4. On or about August 22, 2022, after review and consideration by the Initial Review Committee and multiple communications between Bishop Watson and the Johnson Complainants, Bishop Watson confirmed that the Johnson Complaint conformed with Board of Bishops’ Rules of Judicial Process and Procedure Nos. 3 and 4.⁴

5. On or about October 20, 2022, the Grievance Committee provided written confirmation to the parties that its investigation had begun.

6. On or about October 26, 2022, Respondent provided his initial response to the Johnson Complaint (“Johnson Response”).

7. On or about August 23, 2022, Elder Elvis Piggott (“Piggott”) and Elder Kenneth Faison (“Faison”) (collectively “Piggott Complainants”) filed a separate complaint against Respondent (“Piggott Complaint”).

8. Some of the facts advanced in the Piggott Complaint mirror the allegations in the Johnson Complaint.

9. The Piggott Complaint alleges that Respondent: (a) Count I -- failed to follow the COGIC Constitution, Article VIII, §B in the manner in which Respondent addressed charges against an appointed pastor of the Church of God in Christ, (Article VIII, §D, ¶1(a)); (b) Count II – engaged in malfeasance by obtaining a civil court order that gave possession and legal title of local church property to the Church of God in Christ and is now attempting to sell the property and displace the members of the community, (Article VIII, §D, ¶1(b)); (c) Count III – abused the powers and prerogatives of a Bishop by inviting the civil authorities into the affairs of the Church of God in Christ, (Article VIII, §D, ¶1(d)); and (d) Count IV – engaged in conduct

³ Count III of the Johnson Complaint describes a myriad of alleged behaviors that the Johnson Complainants contend constitute conduct unbecoming a Bishop. Such behaviors include dishonest communication, misuse of the position of the office of the Bishop, and actions which the Johnson Complainants describe as malicious and tyrannical. The remainder of the allegations in Count III relate to Respondent’s alleged tactical and selective use of the 2002 Resolution of the General Assembly related to Sexual Misconduct (“2002 GA Sexual Misconduct Resolution”) to manipulate disciplinary outcomes within the jurisdiction.

⁴ The charges raised in the Johnson Complaint are not isolated. For example, Exhibit 1 of the Johnson Complaint includes a January 18, 2022, letter from several members of the Northwest Florida Jurisdiction addressed to the Board of Bishops. These individuals request that the Board of Bishops examine Respondent’s alleged pattern of misconduct, abuse of power, and reprisals. While this January 18, 2022, letter was not processed as a separate complaint, it is evidence to support the allegations brought forth in the complaints that are the subject of this Statement of Alleged Violations.

unbecoming of a Bishop by failing to display the characteristics of the Word of God and the COGIC Constitution, (Article VIII, §D, ¶1(h)).⁵

10. On or about October 20, 2022, after review and consideration by the Initial Review Committee, Bishop Watson confirmed that the Piggott Complaint conformed with Board of Bishops Rules of Judicial Process and Procedure Nos. 3 and 4.

11. On or about November 4, 2022, Respondent filed his initial response to the Piggott Complainant (“Piggott Response”).

12. On or about November 9, 2022, during the annual meeting of the Board of Bishops, the Grievance Committee requested that the Board of Bishops authorized the Grievance Committee to simultaneously investigate the Complaints, and a new 180 day timeline for investigation of both matters commenced as of November 10, 2022. The Board of Bishops agreed.

13. On or about November 21, 2022, the Piggott Complainants filed a Rebuttal Response to the Piggott Response (“Piggott Rebuttal”).

14. On or about November 22, 2022, Respondent filed his response to the Piggott Rebuttal (“Second Piggott Response”).

15. On or about November 25, 2022, Respondent filed an addendum to the Second Piggott Response and to the combined Complaints (“Response Addendum”).

16. On or about December 5, 2022, Respondent filed an additional response to the Piggott Complaint which he fashioned as a Motion to Dismiss (“Motion to Dismiss”).

Grievance Committee Investigation Process

17. After receiving all of the aforementioned documents for both Complaints, the Grievance Committee conducted its investigation.

18. The investigation included a review of the multiple documents and electronic information produced by the parties, including the available audio and video recordings.

19. On January 17, 2023, members of the Grievance Committee met with and interviewed the Respondent as well as other witnesses identified by Respondent.

20. In addition to the interview of the Respondent and his designated witnesses, the Grievance Committee interviewed Complainants, Superintendent U.L Johnson and Elder

⁵ Article VIII, §D, ¶1(h) is a broad catch all provision of the COGIC Constitution. Article VIII, §D, ¶ 1(h) is the means by which the Board of Bishops may consider a wide range of behavior or conduct that may or may not be characterized as unbecoming to a Bishop. Here, the Piggott Complainants in Count IV describes a variety of actions allegedly taken by Respondent that could conceivably be construed as conduct unbecoming a Bishop.

Kenneth Faison, to ascertain an understanding of and appreciation for the factual allegations raised in both the Johnson and Piggott Complaints.

21. Following his January 17th interview, Respondent submitted an Amended Statement (“Amended Statement”) to the Grievance Committee to address certain questions raised during the investigation and clarify his position with respect to both Complaints. While the organizational structure of the Amended Statement differs from Respondent’s prior responses, the Amended Statement as a whole does not provide the Grievance Committee any new evidence that would change the outcome of its recommendations.

22. It is important to note at the outset that in the Johnson Response, Respondent acknowledges and concedes that Complainants “brought their Complaint to the proper venue and jurisdiction” and committed that he was willing “to submit to the judgment of the Board of Bishops.” *See* Johnson Response, pg. 1. Thus, there is no question that the Board of Bishops has at least concurrent jurisdiction to adjudicate these Complaints. As such, the Grievance Committee has ignored Respondent’s assertions that certain aspects of this dispute have been resolved by other ecclesiastical bodies of the Church.

MOTION TO DISMISS
(Rule of Process and Procedure 3(g))

23. One of Respondent’s recurring defenses to both Complaints is that the allegations against him violate Board of Bishops’ Rules of Judicial Process and Procedure No. 3(g)(1). This defense is premised on the fact that some of the factual allegations advanced by Complainants to support their claims occurred outside the three year statute of limitations.

24. Rule 3(g)(1) provides:

“The Board of Bishops shall not consider a Complaint, nor shall any investigation be undertaken by the Board of Bishops, of any alleged violation which occurred more than three (3) years prior to the date of submission unless the Board of Bishops determines that the conduct supporting the alleged violation is directly related to a violation which occurred within the three (3) years.”

25. Respondent contends that “almost all of the violations allegedly committed by [him] took place more than three years prior to the date of Complainants’ submission.” *See* Piggott Response, pg. 2.

26. While Respondent cites to the appropriate provision of the Board of Bishops’ Rules of Judicial Process and Procedure, and the nature of some of the factual allegations alleged in both Complaints rightly require a review of this particular rule, Respondent wrongly concludes that the Board of Bishops cannot consider the claims brought against him on this basis.

27. First, Rule 3(g)(1) focuses on the timing of the ultimate violation, not the timing of the individual facts alleged to support the claim of a violation. There is a difference between a violation and the facts to support the violation. In other words, the rule considers whether a complaint properly stated a cause of action that occurred within three years of the date the complaint was filed.

28. Moreover, in making his argument, Respondent fails to address the totality of the Rule which provides that even if there are facts alleged outside of the three year statute of limitations, the Board of Bishops may yet consider those facts when it “determines that the conduct supporting the alleged violation is directly related to a violation which occurred within the three (3) years.” Clearly, the Board of Bishops anticipated situations where a complainant might allege a violation that occurred within the three year statute of limitation but proving that violation might require consideration of factual allegations that occurred outside of the three year time period. The rule is designed to allow the Board of Bishops to address continuing behavior, which is what is alleged in both the Johnson and Piggott Complaints.

29. While the Grievance Committee draws no conclusion on the weight that the Board of Bishops should give to the alleged facts which occurred outside of the three year time frame, both Complaints make claims regarding alleged misconduct that occurred within the three year statute of limitations. And there is at least reasonable grounds to believe that the alleged facts that occurred outside of the three year time frame constitute conduct which is “directly related” to the alleged violation within the three year time frame.

30. As such the Grievance Committee disagrees with Respondent by a majority of its members present and voting and does not conclude or recommend that either the Johnson or Piggott Complaints be dismissed as being outside the statute of limitations.

MOTION TO DISMISS (Credibility Claims)

31. In all of his responses, and in his interview with the Grievance Committee, Respondent asserts that the Grievance Committee should dismiss both Complaints because the complaining parties lack credibility.⁶

32. Respondent contends that the Johnson Complaint contains “primarily false, misstatements taken out of context, irrelevant, mischaracterizations and/or old and unfounded attempts to smear Respondent.” *See* Johnson Response, pg. 2. Respondent made similar statements in his response to the Piggott Complaint. *See e.g.*, Piggott Response, pg. 2. Arguing that a complaint contains misstatement or that certain facts were taken out of context alone is not an adequate basis for the Grievance Committee to recommend dismissal of a compliant.

⁶ The Grievance Committee notes that all of the parties generously employ the use of adjectives that are inflammatory and hyperbolic. Use of such language does not aid the Grievance Committee in its investigation and reaching an understanding of the facts. Calling arguments or statements made by the other party “ludicrous” or calling another party a “thug” is not helpful and has, in fact, made it more difficult to comb through the mountains of evidence that the parties have produced.

33. Respondent also repeatedly asserts that the Complainants failed to present “competent” evidence of their charges. Whether evidence is competent is a question for a jury unless the purported evidence is so far outside the bounds of reason that a reasonable person could not consider it. Such is not the case here.

34. It is true that some of the evidence or facts pled by the Complainants, if left standing alone, would be insufficient to warrant a trial. However, when these allegations are considered as a whole in combination and in context with the overall challenge to Respondent’s leadership, these facts must be considered in light of the COGIC Constitutional standards in Article VIII, §D, ¶1 and the Grievance Committee cannot recommend dismissal of the charges.

35. The Rules of Judicial Process and Procedure task the Grievance Committee with the duty to investigate whether there is sufficient evidence to warrant a trial. After reviewing the evidence presented by both parties, and after interviews and consideration of the claims in their entirety, the Grievance Committee concludes that many of the claims brought by the Complainants should be evaluated by the entire Board of Bishops in a trial.

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

36. Counts I in both the Johnson and Piggott Complaints are similar in nature, as they allege that Respondent -- in his efforts to oversee the jurisdiction and perform his duties as the Jurisdictional Prelate as well as administer discipline to various members of the clergy under his charge – has failed to abide by COGIC rules and regulations.

37. As such, the Grievance Committee will address Count I of both Complaints concurrently.

38. The Johnson Complainants allege that: (a) “Respondent has removed leaders from their position without going through a legal trial and receiving orders from the Pastors and Elders Council”; and (b) Respondent appointed and/or upheld leaders who had serious allegations of sexual crimes against children; felony arrest involving drugs and battery, while simultaneously publicly condemning others for similar conduct.

39. These actions, they claim, violate Article VIII, §B. *See Johnson Complaint, pg. 3.*

40. The Piggott Complainants similarly allege Respondent failed to abide by COGIC rules and regulations when he “independently produced charges against the Complainant, which is in direct violation of Article VIII, §B, ¶2 of the COGIC Constitution.” *See Piggott Complaint, pg. 10.*

41. Ultimately, the question for the Board of Bishops to determine is whether Respondent properly followed the COGIC Constitution when managing and/or disciplining the churches and/or pastors (and other clergy) under his charge.

Pastor Kenneth Watts and Westside Ministry
(Items #1 & #2 Johnson Complaint)

42. Johnson Complainants allege that Respondent *of his own accord* initiated, authenticated, and sustained charges against pastors and that he also suspended pastors and declared pulpits vacant without following Church of God in Christ protocol or having just-cause. *See Johnson Complaint, pg. 6.*

43. In his Response, Respondent states that “there are no facts contained in the [Johnson Complaint] that identify any ‘leaders’ that Respondent has removed from their positions in such a manner.” *See Johnson Response, pg. 2.*

44. Respondent’s statement is not an accurate reflection of the record. The Grievance Committee reviewed the Johnson Complaint and the associated exhibits. The Complainants do provide specific examples of instances in which Respondent allegedly removed leaders without following the COGIC constitutional process and where he by comparison appointed and/or upheld leaders that had problematic records.⁷

45. For example, Exhibit 2 to the Johnson Complaint is a copy of a July 30, 2021, letter from Respondent to Pastor Kenneth Watts of the Westside Ministry where Respondent unequivocally states that he was “suspending Pastor Kenneth Watts as Pastor of West Side Church of God in Christ.” *See Johnson Complaint, Exhibit 2.*

46. Exhibit 2 appears to be a unilateral suspension, as there is no indication in the letter specifically or in the record generally that the Respondent followed the requirements of Article VIII, §B that: (a) claims against pastors be brought by the members of the congregation; (b) that the matter be submitted to the clerk of the jurisdiction; and (c) an investigation is completed by the Jurisdictional Pastors and Elders Council, not the Jurisdictional Bishop.

47. The requirement that the local congregation bring the claim is a fundamental tenant of Article VIII, §B. The Respondent does not present any evidence or even claim that a majority of the members of the Westside Ministry presented charges against Pastor Watts.

48. Instead of focusing on the contents of the July 30th letter, Respondent argues in the Johnson Response and in the Amended Statement that the Grievance Committee should ignore any claims flowing from the July 30th letter of suspension because Pastor Watts had formerly resigned from the pastorate and because he attempted to withdraw the Westside Ministry from the control of the Church of God in Christ, Inc.

⁷ The portion of the claim that challenges Respondent’s specific pastoral appointments is not actionable under Article VIII, §B, because Bishops have an unfettered right to appoint any person to a local congregation or a jurisdictional position so long as those persons meet the requirements for leadership promulgated by the General Assembly and the General Secretaries office, e.g., completion of a background check and the sexual misconduct certificate. .

49. In support of this defense, Respondent cites to a February 17, 2021, letter from Pastor Watts' legal counsel in which counsel informed Bishop Green of Westside Ministry's decision to disassociate from the Church of God in Christ. Respondent further contends that because Pastor Watts was no longer a Church of God in Christ pastor, Respondent was not required to follow the requirements of Article VIII, §B.⁸

50. If the Respondent received the February 17, 2021, letter and believed its contents one has to wonder *why* he would have sent his July 30th letter of suspension at all. If Respondent thought that Pastor Watts was no longer affiliated with the Church of God in Christ and that the COGIC constitutional rules did not apply to Respondent's relationship with Pastor Watts and the Westside Ministry, why was there a need to send a letter of suspension? One could reasonably conclude that Respondent was attempting to circumvent Article VIII, §B.

51. Moreover, if what Respondent says is true, and if Pastor Watts had, in fact, resigned, and Respondent knew it at the time, why then did Respondent direct the Council of Pastors and Elders to investigate Pastor Watts. An investigation would not have been necessary or proper as the Jurisdictional Pastors and Elders Counsel would not have had the authority or jurisdiction to investigate a congregation that is not part of the Church of God in Christ.

52. The questions for the Board of Bishops in this regard are simple and narrow – was Respondent correct when he issued his letter of suspension in July 2021 and was he correct when he later directed the Jurisdictional Pastors and Elders to investigate Watts? Had Respondent received a complaint from the members of the Westside Ministry – the only way in which an investigation by the Jurisdictional Pastor and Elders Counsel could have been constitutionally triggered? Were any of those actions consistent with Article VIII, §B?

53. In this one example, the Grievance Committee by a majority of its members present and voting finds that this factual allegation supports a claim and meets the standards of the Board of Bishops' Rules of Judicial Process and Procedure that there is just cause to believe that Respondent failed to abide by the rules and regulations of the Church of God in Christ.

54. However, since there is just cause to believe that Respondent's actions as they relate to Westside Ministry and Pastor Watts violate Article VIII, §B, whether they actually do is a question for a jury of Respondent's peers.

55. If this was the only issue presented to the Board of Bishops or the Westside Ministry issue constituted an isolated incident, the Grievance Committee might not be inclined to recommend a trial concerning Respondent's failure to abide by the rules and regulations of the Church. However, there are other examples of Respondent's alleged failure to abide by the rules

⁸ It is also important to note that the Chairman of the General Assembly, Bishop Lemuel F. Thuston, publicly stated during the 2022 April Call Meeting "that legally the [Westside Ministry] does not need to be restored to the Church of God in Christ because it never fully left..." The recorded public statement was provided to the Grievance Committee in the course of its investigation. Absent a complaint to the contrary, the Grievance Committee must accept the declaration of the Chairman of the General Assembly as an accurate recitation of the facts and the ecclesiastical position of the Church.

and regulations of the Church that the Grievance Committee investigated which suggests a pattern of this type of behavior. These other examples are discussed below.

Pastor Arthur Orr and New Pentecostal Temple Church of God in Christ
(Item #3 Johnson Compliant)

56. In Count I of the Johnson Complaint, the Complainants also allege that during the months of January, February, and March 2022, Respondent created confusion surrounding Pastor Orr, Pastor Faison and New Pentecostal Temple COGIC and failed to follow COGIC rules and procedures as it relates to the process for removing one pastor and appointing another. *See* Johnson Complaint, pg. 7.

57. Respondent states in his response that Complainants failed to articulate any specific rule that he failed to follow with regards to Pastor Orr and Pastor Faison. *See* Johnson Response, pg. 4. Respondent further contends, and Complainants agree, that Elder Orr, one of the Complainants, was never appointed Pastor of New Pentecostal Temple, because Elder Orr never received a clearance from the ARC system (background check and sexual misconduct certificate). *Id.*

58. Respondent is correct. Complainants have not specifically identified any rule or regulation that Respondent failed to follow.

59. Normally, the failure to provide this detail would end the inquiry. Moreover, as previously indicated, it is without question that a Jurisdictional Bishop has the unilateral authority and sole discretion to appoint the pastor of a local congregation. Indeed, that is the hallmark of our ecclesiastical structure.

60. But this aspect of the Complaint is not so much about who was or should have been appointed to be the pastor of New Pentecostal Temple. Instead, it is about the mixed signals that Respondent may have sent to all of the interested parties regarding the leadership of New Pentecostal Temple when he left Arthur Orr in the position of administrator for nearly seven years.

61. The Grievance Committee also acknowledges that it is not a violation of any rule or regulation of the Church for a Bishop to retain control of a local congregation indefinitely. As such, the allegations with respect to the appointment of Pastor Orr is insufficient to warrant a trial for failure to abide by the rules and regulations of the Church.

62. Notwithstanding the foregoing, the Grievance Committee notes that Respondent does not deny that he did, in fact, retain control of this local congregation after Faison transferred New Pentecostal Temple from Southwestern Florida Jurisdiction to Northwest Florida Jurisdiction in 2012.

63. It appears from the evidence now available to the Grievance Committee that Respondent cajoled or coaxed Faison to transfer into his jurisdiction and then took steps to take control of the property.

64. While Respondent's actions would not be a violation of Article VIII, §D, ¶1(a) (failure to abide by the rules and regulations of the church), Respondent's admitted actions coupled with the factual assertions made by the Piggott Complainants might sustain a claim that Respondent engaged in conduct unbecoming a Bishop, which will be discussed below.

65. As such, even though the Grievance Committee finds by a majority of its members present and voting that Respondent's actions with respect to the pastoral appointment of New Pentecostal Temple do not violate Article VIII, §D, ¶1(a), the factual allegations presented by Complainants on this point nevertheless may be used to support the claim that Respondent engaged in conduct unbecoming a Bishop, which the Grievance Committee by a majority of its members present and voting recommends be considered by the entire Board of Bishops at trial.

**Failed to Follow Guidelines for Trial of Local Churches
(Item #4 Johnson Compliant)**

66. Finally, as another example of Respondent's failure to abide by the rules and regulations of the Church, Complainants allege that Respondent failed to follow the guidelines when he personally levied charges against a local congregation. *See* Johnson Complaint, pg. 8.

67. The COGIC Constitution is very specific and provides that the local church may be tried for a variety of offenses. *See* Article VIII, §D, ¶1. The charges must be brought by a member of the local church and not the Bishop. *See* Article VIII, §D, ¶2(a) (“Any member of a local church, who has just cause to believe that the Church of which he is a member has committed any and all of the offenses enumerated hereinabove, may file a charge against the Church.”) (emphasis added).

68. In response, Respondent argues that the Johnson Complainants did not to identify any local congregation or local church against whom Respondent has brought such an action. *See* Johnson Response, pg. 4.

69. The Grievance Committee agrees. Complainants did not clearly identify any instance or the specific congregation to which this particular aspect of Count I is intended to address. The Rules of Process and Procedure only requires notice pleading, not fact pleading. But the Grievance Committee will not advance a claim without more detail.

70. While the Grievance Committee will go to great lengths to provide a complainant the benefit of the doubt when they are advancing a charge, it will not craft a charge out of whole cloth on a complainant's behalf unless the investigation uncovers a clear violation. The Grievance Committee could not uncover an example here.

71. As such, the Grievance Committee concludes by a majority of its members present and voting that Complainants have not properly pled a claim that Respondent violated the rules and regulations of the Church by personally levying charges against a local congregation.

**Pastor Kenneth Faison and New Pentecostal Temple Church of God in Christ
(Piggott Complaint)**

72. Complainants allege that Respondent made a false sexual misconduct claim against Faison. *See* Piggott Complaint, pg. 8. The Grievance Committee makes no finding or statement with regards to the truth or accuracy of the underlying sexual harassment claim against Faison.

73. The Respondent contends in his Response that the sexual misconduct charges against Faison were addressed and resolved over ten years prior to the filing of the instant charge and therefore, it is not relevant. *See* Piggott Response, pg. 2.

74. Respondent is accurate that the original sexual misconduct claim against Faison was raised over ten years ago, and that any challenge to the process employed in that action is barred by the statute of limitations set forth in Rule of Process 3(g) *unless* the conduct supporting the alleged violation is directly related to a violation which occurred within the three years.

75. But, as stated above, the fact that the Faison complaint was adjudicated more than ten years ago is not dispositive. The question now – given that the Johnson and Piggott Complaints have been consolidated – is whether the manner that Respondent handled the Faison sexual misconduct matter could support an otherwise timely claim that Respondent does not abide by the rules and regulations of the Church of God in Christ?

76. Stated differently, a jury might conclude that the process employed to adjudicate the Faison sexual misconduct matter may be the first instance of several examples where Respondent allegedly has not followed the COGIC Constitution in the manner in which he addresses charges against pastors. The Faison complaint process could be indicative of whether Respondent follows the rules and regulations of the Church when addressing disciplinary concerns.

77. Setting the original sexual misconduct claim against Faison aside, it still appears that Respondent failed to adhere to the rules and regulations of the Church as it relates to Faison's on going conduct and relationship with the jurisdiction.

78. Two of the exhibits attached to the Piggott Complaint demonstrate that Respondent's actions which are the basis of his alleged failure to abide by the rules and regulations of the Church continue to a point well within the statute of limitations.

79. For example, Exhibit 14, a July 15, 2022, letter from Respondent, is a written order to cease and desist. Specifically, Respondent demands that Faison "cease all activities at Pentecostal Temple #2, 1060 Snowden Road Monroeville, Alabama."

80. Whether Faison was legally operating on the premises is a question for the Jurisdictional Pastors & Elders Council.

81. Thus, the question for the Board of Bishops is whether a Jurisdictional Bishop has the authority to issue a letter to cease and desist when there has not been a prior decision by the relevant Jurisdictional Pastors and Elders Council that the person to whom the letter is directed has done something improper.⁹

82. Exhibit 15 of the Piggott Complaint is more telling. It is a July 17, 2022, letter from Respondent to Dr. Cassondra Gordon, the Florida Northwest Jurisdictional Secretary, and Elder Anthony Henderson, Chairman of Council of Pastor & Elders outlining charges. In the July 2022 letter, Respondent enumerates a plethora of claims against Faison. The letter refers to the “undersigned members” but is only signed by the Respondent. The letter purports to outline 14 different charges against Faison.

83. The letter does not articulate in what capacity the charges against Faison are being brought.

84. By sending this letter in this fashion, the Grievance Committee believes that a jury could conclude that Respondent did not abide by the rules and regulations of the Church of God in Christ.

85. First, as an important aside, based on these dates within the document itself, Respondent’s actions clearly took place within the three year statute of limitations.

86. Second, Exhibit 15 could be read to establish the fact that Respondent did not abide by the rules and regulations of the Church because, as the Complainants allege, the charges were brought by the Bishop, and not the members of the local congregation.

87. Again, under Article VIII, §B only local members are entitled to bring charges against a pastor¹⁰, which is an absolute requirement of Article VIII, §B. And while the July 17, 2022, letter references “undersigned members” that purportedly advanced these allegations against Faison, the only signature on the letter is that of the Respondent.

88. The Grievance Committee concludes by a majority of its members present and voting that Respondent that with regards to the July 17, 2022, letter to cease and desist, there is

⁹ The Grievance Committee recognizes that without question there are instances when a Jurisdictional Bishop would be authorized to send such a letter without a decision from the Jurisdictional Pastors & Elders Council, i.e., when the Jurisdictional Bishop receives a specific directive or authorization from the Presiding Bishop or General Board under the 2002 GA Sexual Misconduct Resolution. There is no indication that Respondent received such authorization.

¹⁰ While the Grievance Committee appreciates the notion that there are certainly occasions when a Jurisdictional Bishop may need to address misconduct by a member of the clergy under his charge, the COGIC Constitution is clear that charges against a pastor must first come from the congregation. *See* Article VIII, §B, ¶2(a). This is the standard that has been consistently applied by the Grievance Committee and it is the Grievance Committee’s understanding that this is the standard employed by the General Council of Pastors & Elders.

just cause to believe that Respondent failed to abide by the rules and regulations of the Church of God in Christ as required by Article VIII, §D, ¶1(a).

Sexual Misconduct Board

89. In the course of its investigation, the Grievance Committee identified one additional matter that requires consideration by the Board of Bishops.

90. The Florida Northwest Jurisdiction has instituted and operates through a Sexual Misconduct Board. Additionally, it is clear that Respondent uses the 2002 GA Sexual Misconduct Resolution to bolster his challenges against certain individuals.

91. Respondent, as well as the jurisdictional secretary, informed the Grievance Committee that the Florida Northwest Jurisdiction jurisdictional assembly at some undetermined point created a Jurisdictional Sexual Misconduct Board or Committee. What neither of them could explain is how the actions of the Jurisdictional Sexual Misconduct Board conforms with the COGIC Constitutional process for disciplining pastors and elders.

92. While the Sexual Misconduct Handbook promulgated and distributed by the office of a previous General Counsel could be a useful tool in policing sexual misconduct in the Church, its recommendations were never adopted by the General Assembly. Thus, the directives contained therein cannot be read to supersede, supplant or replace the specific disciplinary process and procedures related to pastors and local churches set forth in Article VIII of the COGIC Constitution.¹¹

93. To this point, Respondent has not reconciled how the Jurisdictional Sexual Misconduct Board's orders comport with Article VIII, §B.

94. The same could be said regarding how Respondent has employed the 2002 GA Sexual Misconduct Resolution. The intent of the resolution is to help the Church manage sexual (and other types of) misconduct by leaders that have the "potential to substantially impact the National Church financially, morally and spiritually." But the 2002 GA Sexual Misconduct Resolution makes clear that the authority to suspend a member of the clergy rests with the Presiding Bishop and the General Board unless that authority has been delegated to the Jurisdictional Bishop where the misconduct occurred.

95. The Grievance Committee interprets 2002 GA Sexual Misconduct Resolution to mean that a Jurisdictional Bishop does not have unilateral authority to suspend a leader without process. Instead, if the Jurisdictional Bishop desires to suspend a credentialed member of COGIC without process under the authority of the 2002 GA Sexual Misconduct Resolution, he must first in every instance receive a specific mandate from the Presiding Bishop, the General Board, or the Presiding Bishop's representative (e.g., the General Counsel).

¹¹ In Exhibit 15 of the Piggott Complaint, Respondent specifically states that "Faison has continued to defy an Order from the Sexual Misconduct Board which found him guilty of sexual misconduct against a member of the church" See Piggott Complaint, Exhibit 15.

96. The Grievance Committee does not minimize the difficulty this might be in the circumstance when there are allegations of sexual misconduct floating around. But a Jurisdictional Bishop must understand his limitations and cannot overstep the COGIC Constitutional proscriptions.

97. Here, Respondent does not allege at any point that he received a specific mandate from the Presiding Bishop or the General Board to suspend Faison.

98. While it is understandable that a Jurisdictional Bishop could be confused and not understand the implications of the unadopted Sexual Misconduct Handbook promulgated by the Office of General Counsel; and while it is also possible that a Jurisdictional Bishop may not appreciate the limitations of the 2002 GA Sexual Misconduct Resolution, when reviewing the evidence in its totality it seems that Respondent does not take seriously the limitations of his office and that pastors and other members of the clergy have rights to procedural process under the COGIC Constitution.

99. WHEREFORE, for all the reasons set forth above, the Grievance Committee concludes by a majority of its members present and voting that there is just cause to believe that in multiple instances Bishop Wille C. Green violated Article VIII, §D, ¶1(a) by not abiding by the rules and regulations of the Church of God in Christ as it relates to the operation of his duties and administration of discipline of clergy under his charge.

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

100. Complainants claim in Count II of both Complaints that Respondent engaged in malfeasance. The actions alleged to constitute malfeasance include: (a) forming a not-for-profit corporation with the intent to commit fraud and deceive the Jurisdiction, the National Church and the court; (b) filing civil charges against Westside Ministry, Inc., Kenneth Watts, Frankie Huff, and Coston Huff on behalf of the Church of God in Christ, Inc. without authorization; (c) changing the locks of the Westside Ministry properties effectively locking out Pastor Watts and Pastor Nesbitt; (d) threatening criminal and civil charges against Pastor Piggott for behaviors Respondent believed to be unbecoming to a Church of God in Christ leader; and I obtaining a civil court order that gave possession and legal title of local church property to the Church of God in Christ and is now attempting to sell the property and displace the members of the community.

101. The claims advanced in the Johnson Complaint refer to actions taken by Respondent to have taken place in 2021, clearly within the statute of limitations set forth in Rule of Process and Procedure 3(g).

102. Both Complaints define “malfeasance” similarly, i.e., a wrongful act which the actor has no right to do, or any wrongful conduct which affects, interrupts, or interferes with performance of official duty, or an act for which a person ought not to do at all, or the unjust

performance of some act which the party had no right or which he had contracted not to do. *See e.g., Johnson Complaint, pg. 8; Piggott Complaint, pg. 10.*

103. Respondent states in his responses that even if the allegations are true, none of these aforementioned actions would constitute malfeasance.

104. The Grievance Committee agrees with Respondent, in part. Labeling an otherwise lawful action as unlawful based upon supposed fraudulent intent is insufficient to convert the action into an actionable claim of malfeasance.

105. In this regard, the Grievance Committee finds that forming a not-for-profit corporation in and of itself does not constitute malfeasance so long as the person creating the not-for-profit enterprise followed the law.

106. There are no allegations that Respondent failed to follow the law in forming the corporation.

107. The only way that the act of forming the not-for-profit could morph into an act of malfeasance is if Complainants could establish that Respondent had a nefarious purpose or intent in creating the entity, e.g., to embezzle money. Complainants must establish fraudulent intent to transform the act of creating a not-for-profit into malfeasance.

108. Here, Complainants do not proffer any evidence to meet their minimum burden of pleading fraudulent intent, and the Grievance Committee's investigation did not uncover any additional evidence. In short, using the word "fraud" is not enough to justify moving this aspect of the Johnson Complaint forward. While Complainants allege that the purpose for creating the corporation was to commit fraud and deceive the local church, the jurisdiction, and the national church, the Grievance Committee also agrees with Respondent that using pejorative adjectives alone to describe otherwise lawful behavior does not delegitimize the behavior or actions which are otherwise lawful. One must allege specific fact.

109. Stating fraudulent intent alone is not enough for the Grievance Committee to recommend a trial. And the Grievance Committee cannot garner from the pleadings and documents it obtained that Respondent conducted himself in such a way that one could reasonably infer fraudulent intent.

110. As such, there is no basis to try Respondent for malfeasance based upon his formation of a not-for-profit corporation.

111. However, Count II in both Complaints include several other claims of alleged improper actions that Complainants contend Respondent engaged that when considered in the full context of the combined Complaints, one could conclude that the aggregation of acts amounted to malfeasance.

112. For example, did Respondent have the right to file a lawsuit in civil court against Westside Ministry, Inc. Kenneth Watts, Frankie Huff, and Coston Huff on behalf of the national

church without authorization? Was that an action that he should not have done or that he had no right to do?

113. It is a matter of fact that a lawsuit was filed. So, the question is whether Respondent's filing of the lawsuit constituted a wrongful act within in the meaning of malfeasance as defined in the COGIC Constitution? Stated differently, was the filing of the lawsuit an action that Respondent should not have done (as defined in the definition of malfeasance) even though he had a legal right to do so?¹²

114. Attorney Jonathon Saffold, COGIC General Counsel, in a February 8, 2022 letter (attached as Exhibit 6 to the Johnson Complaint) stated that Respondent was not authorized to file the lawsuit on behalf of the National Church and implies that he should not have done so.¹³

115. While the National Church may have later reversed its position with regards to the filing of the lawsuit due to a change in factual circumstances, it does not change the fact that it was improper to file the lawsuit in the first instance.

116. In addition, the General Assembly's Reconciliation and Mediation Committee found that Respondent "did not exhaust all remedies in the ecclesia" and represented himself in civil court as an agent of the Church "that did not give him power to involve the Church of God in Christ, Inc." The Committee goes on to conclude that "[t]here is no record that [Respondent] went to his immediate supervisors: the Board of Bishops, Presiding Bishop or General Board, before he went to the secular arena." *See* Report of the General Assembly's Reconciliation and Mediation Committee: Green vs. Watts.

117. Thus, the question of whether the filing of the Westside Ministry lawsuit on behalf of the national church without proper authorization constitutes malfeasance is something for a jury of Respondent's peers to decide.

118. In further support of their claim of malfeasance, the Complainants allege that on November 27, 2021, Respondent ordered Jason Potts to change the locks of the Westside Ministry in order to lock out Pastor Watts and Pastor Nesbitt.¹⁴ They contend that Respondent did not have a right to do so.

119. Respondent's responds that there is no evidence that he ordered that the locks be changed and that even if he had done so, it would not have amounted to malfeasance. *See* Johnson Response, pg. 4.

¹² A similar question is raised in Count III – abuse of power.

¹³ Attorney Jonathan Saffold wrote: "Ecclesiastical jurisdictional bishops do not have the authority to initiate or amend litigation invoking the name of the Church of God in Christ, Inc."

¹⁴ Complainants provided video evidence of Jason Potts that he had the locks changed and that Respondent ordered him to do so.

120. Respondent's statement is contrary to the Jason Pott's video statement provided by Complainants. And while Respondent provides additional detail in his January 17th Addendum challenging Complainants underlying theory of malfeasance, he concedes that he told Watts that "if [Watts] did not give [Respondent] keys as promised that Respondent would have the locks change so that he could have access as ordered by the Court". See Response Addendum, pg. 14. He further concedes that "Potts was instructed to call the locks [sic] smith and have keys made". *Id.* Respondent then attempted to suggest that Potts changes the locks and that Respondent was not complicit in the decision to do so.

121. Of course, this incident relates to the underlying dispute regarding control of the Westside Ministry and the associated properties. It further relates to the appropriateness of the Westside Ministry lawsuit.

122. Finally, Complainants allege that Respondent committed malfeasance when he threatened criminal and civil charges against Pastor Piggott for Piggott's conduct that Respondent claimed was unbecoming to a COGIC leader. Complainants support this alleged violation with an affidavit from Pastor Piggott. See Piggott Complaint, Exhibit 34.

123. Respondent does not deny that a lawsuit was filed or that he threatened civil and criminal actions against others. Instead, he responds that "filing a civil or criminal complaint against another person in accordance with the law" is not malfeasance. See Johnson Response, pg. 5.

124. Respondent is correct that filing a lawsuit or threatening criminal action standing alone may not amount to malfeasance. However, the definition of malfeasance includes actions that a party may have the "right" to do, but nevertheless ought not do. The plethora of civil legal activity and criminal reporting in this jurisdiction by the Respondent raises concerns for the Grievance Committee.

125. With this mountain of factual disagreement and the question of intent, the Grievance Committee concludes that a jury of Respondent's peers should review the facts and determine whether Respondent's actions (or non-action) with respect the changing of the locks at the Westside Ministry constitutes malfeasance in violation of the COGIC Constitution.¹⁵

126. WHEREFORE, for the reasons set forth above, the Grievance Committee concludes by a majority of its members present and voting that there is just cause to believe that Bishop Wille C. Green violated Article VIII, §D, ¶1(b) by committing malfeasance.

COUNTS THREE & FOUR
ABUSE OF POWER AND CONDUCT UNBECOMING A BISHOP
(Article VIII, Section D, ¶¶1(d) & (h))

127. Counts III of the Johnson Complaint and Counts III & IV of the Piggott Complaint contain related factual allegations which Complainants attempt to connect to different

¹⁵ Concerns related to Respondent's decision to the change the Westside Ministry locks are also included in Complainant's claim that Respondent engaged in conduct unbecoming a Bishop discussed below.

provisions of the COGIC Constitution – i.e., Article VIII, §D, ¶1(d) (abuse of power and prerogatives of the office of the Bishop) and Article VIII, §D, ¶1(h) (conduct unbecoming a Bishop. As such, the Grievance Committee considered them jointly.

128. Specifically, Complainants allege that “within the last three years, the [r]espondent has filed civil charges or attempted to have the civil court intervene or rule in church matters.” *See* Piggott Complaint, pg. 11. Complainants go on to say that “Respondent filed Civil Charges against the Complainant’s church resulting in the court awarding the Complainant’s church to the Respondent unjustly in 2019.” *Id.* Finally, the Piggott Complaint alleges that Respondent attempted to file “civil charges against Complainant in July of 2022.” *Id.*

129. This abuse of power claim focuses on Respondent’s alleged propensity to invoke the civil judicial authorities to resolve internal COGIC disputes. Complainants allege that Respondent’s tendency to invite civil authorities into the affairs of the Church violates the policy provisions set forth in the portions of the COGIC Constitution that created the Judiciary Board in 1990.

130. The idea is that Respondent should first seek redress within the confines of COGIC polity before filing civil or criminal actions in the secular arena.

131. Of course, the Grievance Committee acknowledges Respondent’s right to avail himself of the civil judicial system when the circumstances demand such. However, the concern here is the frequency in which Respondent resorts to the civil courts, i.e., the quantity of civil claims may be indicative of abuse of power, without first seeking resolution through the ecclesiastical system.

132. In response, Respondent contends that the abuse of power claim is time-barred by Rule of Judicial Process and Procedure 3(g). *See* Piggott Response, pg. 2. Respondent argues that the 2019 civil action referenced by Complainants actually refers to a civil action first filed in 2013 and finalized in 2018. *See* Piggott Response, pg. 3. Respondent further contends that the referenced 2019 court activity was initiated by Complainants, and thus could not form the basis of a complaint before the Board of Bishops. *Id.*

133. The Grievance Committee concludes that the abuse of power claim is not time-barred. Respondent is correct that the case involving Pentecostal Temple #2 was first filed in 2013 (“2013 Pentecostal Temple Lawsuit”). However, the activity associated with the 2013 Pentecostal Temple Lawsuit is indicative of other litigation filed by Respondent within the three (3) years of the filing of the Piggott Complaint. *See* Piggott Rebuttal, pg. 2. In other words, the 2013 Pentecostal Temple Lawsuit could demonstrate a pattern and practice of abuse of power.

134. More importantly, the 2013 Pentecostal Temple Lawsuit is not the only civil action at issue. Respondent does not deny that on October 4, 2021, he also filed a separate lawsuit for defamation against Christopher R. Johnson, Kenneth Watts and others. And there is other evidence of the propensity to file lawsuits.

135. But even if the cases referenced by the Piggott Complainants were not timely filed, the allegations in the Piggott Complaint regarding overuse of the civil courts are similar to the allegations in Count II of the Johnson Complaint where those Complainants assert that Respondent filed civil charges against “Westside Ministry, Inc., Kenneth Watts, Frankie Huff, and Coston Huff” on September 3, 2021, which is clearly within the statute of limitations.

136. The Grievance Committee concludes that because both Complaints identify civil litigation that Respondent filed within the statute of limitations, any cases that fall outside the statute of limitations are nevertheless probative of the underlying abuse of power claim and can be considered because the conduct is directly related to timely claims.

137. Respondent makes a separate argument for rejecting Complainants’ abuse of power claim. He contends that the Grievance Committee should ignore any of Faison’s statements because he has “told so many lies during his sworn testimony at the [civil] hearing that even his own attorney acknowledged his perjury and impeachment.” *See* Piggott Response, pg. 4.

138. With respect to Respondent’s claim that the statements made by Faison in support of the Piggott Complaint should be ignored or rejected out of hand because Faison is alleged to be a liar, the Grievance Committee concludes that it is more appropriate for a jury of Respondent’s peers to evaluate and make a determination regarding Faison’s credibility.

139. Again, if Faison was the only witness in this combined case or the only person advancing these charges, and if there was no documentary and video evidence to support the claims, the Grievance Committee might be inclined to make a recommendation to reject the case based upon this one witness.

140. But this is not the facts presented here. In this case, there are several witnesses, several documents and several affidavits all reviewed by the Grievance Committee as part of its duty to make a just cause determination.

141. To be clear, the Grievance Committee is not offering an opinion on the strength or credibility of Faison as a witness. Instead, the Grievance Committee finds that Faison’s testimony should be evaluated along with all of the other evidence on the questions presented by these Complaints.

142. The Board of Bishops as a whole is uniquely positioned to consider whether Respondent’s actions in the filing of multiple civil actions is an overuse or abuse of his authority. In other words, just because he could do it, does not mean he should have.

143. Clearly, the COGIC Constitution contemplated limits to executive authority or it would not have included the abuse of power provision in Article VIII, §D, ¶1(d). Thus, it is duty of Respondent’s peers to determine whether he exceeded the limits of that authority in his administration of the jurisdiction. It is the duty of Respondent’s peers to provide meaning to the abuse of power proscription contained in the COGIC Constitution. Only a determination at trial could provide the requisite clarity on this point.

144. Count III of the Johnson Complaint and Count IV of the Piggott Complaint both allege that Respondent engaged in conduct unbecoming of a Bishop in violation of Article VIII, §D, ¶1(h). This section of the COGIC Constitution is the broad catch all provision designed to address issues that may or may not fit squarely within the other provisions. Thus, a violation of another provision of the COGIC Constitution could also be cast as a violation of this paragraph “h”.

145. Complainants in both the Johnson Complaint and the Piggott Complaint allege conduct that they contend is unbecoming of a Bishop. *See* Johnson Complaint, pgs. 11-15; Piggott Complaint, pgs. 12-13.

146. As previously indicated, the Grievance Committee cannot parse through every allegation and every argument presented by the parties. The Grievance Committee’s sole duty is to determine whether there is just cause to believe that Respondent may have violated in this instance Article VIII, §D, ¶1(h) of the COGIC Constitution. In other words, have the Complainants alleged and provided sufficient evidence to advance this charge of conduct unbecoming a Bishop to the entire Board of Bishops for trial.

147. We believe that they have. For example, in their effort to establish that Respondent engaged in dishonest communication they claim that “during the December 2020 Northwest Florida Jurisdictional meeting the Respondent ... discuss[ed] the jurisdiction taking Pastor Watts to court.” And that in that discussion Respondent stated that “the National church was behind” him “to protect the jurisdiction.” *See* Johnson Complaint, pg. 11.

148. Complainants allege that they later found out that “the National church had not authorized the Respondent’s actions”. *Id.* This, of course, has been confirmed by the General Counsel and General Assembly.

149. In response, Respondent argues that this particular allegation cannot be true because “no such meeting took place [in] *December 2020* (emphasis added).” Johnson Response, pg. 5.

150. Respondent’s argument is disingenuous. The record clearly reflects that the relevant meeting took place in December 2021 and Complainants reference to *December 2020* is nothing more than a non-fatal typographical error.¹⁶

151. When it became clear that Complainants had accurately identified a specific meeting where certain statements were allegedly made by Respondent, Respondent altered his response. In his Addendum, his primary challenge to this particular charge is that Superintendent Miller’s letter is false because Superintendent Miller was not at the meeting.

¹⁶ Exhibit 13 of the Johnson Complaint, a March 6, 2022, letter signed by Superintendent Walter Miller wherein he states that the meeting occurred in December of 2021 during the monthly credential holder conference.

152. Respondent's position transformed from "the allegation can't be true because a meeting didn't occur in December 2020" to "it can't be true because Superintendent was not at the meeting." Interestingly, Respondent never unequivocally denies making the statement and Superintendent Miller could have received this information from someone at the meeting.

153. More importantly, Respondent misses the point altogether. The Grievance Committee finds that the dates of the meeting and who was in attendance is not critical to the primary position being proffered by the Complainants. The issue is whether the Respondent ever told anyone in the jurisdiction that "the National church was behind him taking Pastor Watts to court to protect the jurisdiction."

154. What we know for certain is that Respondent told the civil court that the national church authorized him to bring the civil claim against Pastor Watt. So, one could reasonably deduce that he may have made a similar statement to others.

155. And we also know that Attorney Saffold stated in writing that Respondent did not have authority to bring the action. So, any statement by the Respondent to the contrary would be problematic at a minimum.

156. So, the question before the Board of Bishops is whether Respondent exercised integrity when he communicated with civil authorities as well as the jurisdiction, regarding his authority to bring the cause of action. And if was not forthright, would his failure to operate in integrity constitute conduct unbecoming a bishop?

157. Again, if this was the only claim regarding Respondent's internal communication the Grievance Committee would not be inclined to recommend a trial. But the Johnson Complainants cite to other instances in which it appears that Respondent's communication may not have been straightforward. *See Johnson Complaint, pgs. 11-13.*

158. Count III of the Johnson Complaint and Count IV of the Piggott Complaint point to additional behavior or actions taken by Respondent that Complainants claim constitute conduct unbecoming a Bishop.

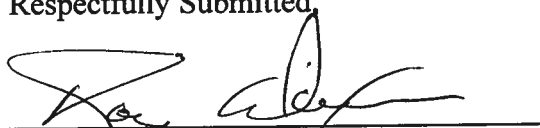
159. In general, the Grievance Committee has examined the factual allegations that relate to the specific claims that it believes warrant a trial by the entire Board of Bishops and due to the limitations of time and resources the Grievance Committee not addressed in this Statement of Alleged Violations the remaining allegations proffered by the Complainants or responses made by the Respondent.

160. The decision not to include or consider in this Statement of Alleged Violation a specific fact alleged by Complainants or response made by the Respondent should not be construed to mean that the Grievance Committee agrees with or rejects the alleged fact or response, nor should it preclude any of the parties from raising the fact or response at a trial to the extent that the Judicial Committee agrees with the Grievance Committee that these two Complaints should be adjudicated at a trial before the Respondent's peers.

161. WHEREFORE, for all the reasons set forth above, the Grievance Committee concludes by a majority of its members present and voting that there is just cause to believe that Bishop Wille C. Green violated: (a) Article VIII, §D, ¶1(d) by abusing the powers and prerogatives of a Bishop; and (b) Article VIII, §D, ¶1(h) by engaging in conduct unbecoming of a Bishop.

Dated April 18, 2023

Respectfully Submitted,

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

Bishop Roy Dixon
Committee Chairman