

COGIC

vs.

Westside Ministry

Deposition of:

Willie Green

June 28, 2023

Vol 01



IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
IN AND FOR ESCAMBIA COUNTY, FLORIDA

CASE NO. 2021-CA-002561

CHURCH OF GOD IN CHRIST, INC.,
NORTHWEST FLORIDA JURISDICTION
CHURCH OF GOD IN CHRIST, INC.,
WESTSIDE CHURCH OF GOD IN CHRIST,
Plaintiffs/Counter-Defendants,

vs.

ELDER KENNETH WATTS, INDIVIDUALLY
AND AS PASTOR AND AS CHAIRMAN OF
THE BOARD OF TRUSTEES, WESTSIDE
COGIC, WESTSIDE MINISTRY, INC.,
WESTSIDE CHURCH OF GOD IN CHRIST
OF ESCAMBIA COUNTY, WESTSIDE MINISTRY,
INC., COSTON HUFF, AND FRANKIE LEE HUFF,
Defendants/Counter-Plaintiffs.

Volume 1 (Pages 1 - 155)

VIDEO-RECORDED DEPOSITION OF
WILLIE GREEN

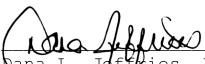
Wednesday, June 28, 2023
9:10 a.m. - 12:17 p.m.

LOCATION:

LEXITAS
220 West Garden Street, Suite 603
Pensacola, Florida 32502

Stenographically Reported By:
Dana L. Jeffries, RPR

JOB NO. 317055

<p>1 APPEARANCES: Page 2</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFFS:</p> <p>4 Law Office of Fredrick J. Gant</p> <p>5 322 W Cervantes Street</p> <p>6 Pensacola, FL 32501-3030</p> <p>7 850-433-3230</p> <p>8 BY: FREDERICK J. GANT, ESQUIRE</p> <p>9 ffgant@yahoo.com</p> <p>10</p> <p>11 ON BEHALF OF THE DEFENDANTS:</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>ALSO PRESENT:</p> <p>Felicia Watts-Kidd, Board Member</p> <p>Mr. And Mrs. Kenneth Watts</p> <p>Richard McNulty, Videographer</p>	<p>1 CERTIFIED QUESTIONS Page 4</p> <p>2 Deposition of Willie Green</p> <p>3 Volume 1</p> <p>4 *****</p> <p>5</p> <p>6 Page 7 Line 6</p> <p>7 Page 28 Line 5</p> <p>8 Page 28 Line 20</p> <p>9 Page 32 Line 16</p> <p>10 Page 33 Line 22</p> <p>11 Page 34 Line 9</p> <p>12 Page 34 Line 15</p> <p>13 Page 34 Line 20</p> <p>14 Page 34 Line 25</p> <p>15 Page 35 Line 13</p> <p>16 Page 37 Line 2</p> <p>17 Page 102 Line 14</p> <p>18 Page 105 Line 12</p> <p>19 Page 137 Line 17</p> <p>20 Page 149 Line 3</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>*****</p> <p>Christopher Johnson Statement Regarding Certified Questions</p> <p>Page 44 Line 16</p> <p>*****</p> <p></p> <p>Dana L. Jeffries, RPR</p> <p>Registered Professional Reporter</p>
<p>1 INDEX OF WITNESS Page 3</p> <p>2 PAGE</p> <p>3 Volume 1</p> <p>4 WILLIE GREEN 4</p> <p>5 Certified Questions 6</p> <p>6 Direct Examination by Mr. Johnson 152</p> <p>7 Certificate of Oath 153</p> <p>8 Certificate of Reporter 154</p> <p>9 Read and Sign Letter 154</p> <p>10 Errata Sheet 155</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>INDEX OF EXHIBITS</p> <p>PLAINTIFFS'</p> <p>EXHIBIT DESCRIPTION</p> <p>None</p> <p>DEFENDANTS'</p> <p>EXHIBIT DESCRIPTION</p> <p>A Notice of Filing of COGIC General Assembly Minutes April 5-6, 2022 As Approved on November 2022 84</p> <p>B Joint Order of the Presiding Bishop & General Assembly 98</p>	<p>1 (The following deposition began in Volume 1 at 9:10 Page 5</p> <p>2 a.m.)</p> <p>3 THE VIDEOGRAPHER: The time is 9:10, and we</p> <p>4 are now on the record. This is the</p> <p>5 video-recorded deposition of Willie Green in the</p> <p>6 matter of Church of God in Christ versus Westside</p> <p>7 Ministry. The deposition is being held at</p> <p>8 Lexitas, 220 West Garden Street, Suite 603, in</p> <p>9 Pensacola, Florida, on June 28, 2023.</p> <p>10 The videographer is Richard McNulty and the</p> <p>11 court reporter is Dana Jeffries, both in</p> <p>12 association with Lexitas.</p> <p>13 Will counsel please announce their</p> <p>14 appearances for the record.</p> <p>15 MR. GANT: Fred Gant for COGIC and -- which</p> <p>16 is Church of God in Christ, and Westside Church</p> <p>17 of God in Christ.</p> <p>18 MR. JOHNSON: Christopher Johnson for all</p> <p>19 of the named defendants.</p> <p>20 THE STENOGRAPHER: Raise your right hand</p> <p>21 and I'll swear you in, please.</p> <p>22 Do you swear or affirm the testimony you</p> <p>23 are about to give to this cause will be the</p> <p>24 truth, the whole truth and nothing but the truth?</p> <p>25 THE WITNESS: I affirm.</p>

Page 6

1 Thereupon,
2 WILLIE C. GREEN
3 having been first duly sworn or affirmed, was examined
4 and testified as follows:
5 DIRECT EXAMINATION
6 BY MR. JOHNSON:
7 Q All right. Bishop, can you just please
8 state your full name for the record?
9 A My name is Willie C. Green. My title is
10 bishop.
11 Q Okay. And where do you currently reside?
12 A I live at 296 Bradwell Road, Quincy,
13 Florida.
14 Q Okay. Do you have any other residences
15 currently?
16 A What do you mean do I have any other
17 residences? Do I have any other places where I have
18 homes or apartments?
19 Q Any other places you live, yes, sir.
20 A Yes, I do have.
21 Q Okay. Where -- where at?
22 A I have a house here in Pensacola.
23 Q Okay.
24 A 7771 Breeze Wood Circle. I have another
25 house in Quincy, 200 Gray Street. So those are two

Page 7

1 places where I have residence -- additional
2 residences.
3 Q No others?
4 A No other residences. There are other
5 properties that I own.
6 Q All right. Tell me about those. Where do
7 you own properties?
8 A Not relevant, in my opinion. I just --
9 Q I understand, but I'm asking you to provide
10 this background information for me.
11 MR. GANT: I object to the question. It's
12 only given to be intrusive into the witness's
13 personal matters. They're intrusive into his
14 personal matters, not relevant at all to the
15 issues at hand. I object. It's being used to
16 harass the witness.
17 Additionally, this deposition is recorded,
18 and the nature of the opposing counsel,
19 Mr. Johnson, in the past is to put evidence into
20 social media, to reveal my client's properties on
21 social media, which Mr. Johnson intends to do
22 with this deposition. It's totally out of hand
23 with the rules of our court system.
24 It's abrasive to the witness. It's not -- it's
25 not -- it's not -- it's a safety concern to the

Page 8

1 witness and -- to expose other's personal matters
2 that are totally irrelevant to the case at hand.
3 And Mr. Johnson's proclivity to put things
4 on social media for purposes related to justice,
5 we refuse to answer that question for those
6 reasons.
7 MR. JOHNSON: Are you -- you're instructing
8 your client to refuse to answer the question?
9 MR. GANT: You want to put public
10 information on social media. So irrelevant to
11 this proceedings. Your reason, your causation
12 for such a matter, it's to harass the witness and
13 give him a hard time.
14 And for that reason, yes, don't answer the
15 question.
16 MR. JOHNSON: Okay. I'll certify the
17 objection.
18 I'll briefly respond by stating
19 unequivocally that I, nor anybody at my direction
20 or even suggestion, has ever posted anything on
21 social media in this case or any other case, or
22 even in my private life. I do not adhere to any
23 social media.
24 I have a Facebook page in the name of my
25 law firm that I haven't looked at in ages. Don't

Page 9

1 even know what's on it. And that's the only
2 social media I'm aware of.
3 And I state all of that for the record, as
4 an officer of the Court. I'm continually accused
5 of this. So, once again, as an officer of the
6 Court, I will state that I have never posted
7 anything nor have I suggested, let alone asked
8 anybody, to post anything on social media.
9 The questions that I'm asking right now are
10 background questions that I believe I am entitled
11 to know for no -- for other reasons, but for the
12 reason that this is a case in which both parties
13 have asked for a jury trial. When any party is
14 asking for a jury trial, it is certainly
15 anticipated that we'll be picking a jury. And
16 when attorneys pick a jury, we have an absolute
17 right to know whether or not there could be any
18 possible affiliation or familiarity with any of
19 the parties in the case. And simple background
20 information regarding properties that people may
21 own, seems to me to fall into that category,
22 particularly if he owns any properties in
23 Escambia County, Florida, where the jury will be
24 picked from.
25 Now, in an interest to kind of move on,

Page 10

1 although I am certifying the question, and we'll
2 deal with it in the court, I will rephrase the
3 question right now to ask if he owns any
4 properties in Escambia County, Florida.
5 MR. GANT: It's asked and answered. He
6 already told you --
7 MR. JOHNSON: I didn't ask that question.
8 MR. GANT: He's already told you --
9 MR. JOHNSON: Okay.
10 MR. GANT: -- properties in Escambia
11 County.
12 MR. JOHNSON: Mr. Gant, is the entire
13 deposition going to go this way?
14 MR. GANT: If you pose questions designed
15 to harass my client, to discern information
16 that's totally irrelevant for whatever the
17 purpose is. As to your social media comment, not
18 having any, we know that you have a guy named
19 Moses Tyson communicate -- Moses --
20 THE STENOGRAPHER: I'm having a hard time.
21 MR. GANT: I'm sorry.
22 THE STENOGRAPHER: Can you slow down,
23 please?
24 MR. GANT: A guy named Moses Tyson
25 communicate quite often. Moses Tyson, someone

Page 11

1 you know very well, posts things on social media
2 that you provide to him. Okay? So we know that
3 as a matter of fact. So if you're going to deny
4 that, then of course, you can do that now,
5 because as an officer of the Court, deny that you
6 provide things to Moses Tyson.
7 MR. JOHNSON: I deny that, yes.
8 MR. GANT: Okay.
9 MR. JOHNSON: And I invite you to -- I
10 invite both of you to notify the Bar Association
11 and go down this road. I invite you to do that.
12 And so we can just move on with the case. I
13 invite you to. If you have any evidence
14 whatsoever that I'm providing -- I don't know,
15 documents to Moses Tyson, please tell me because
16 I'm not aware I've ever done anything remotely
17 like that.
18 MR. GANT: I didn't mention the Bar,
19 Mr. Johnson. I said you have provided things to
20 Moses Tyson to get to social media. I didn't
21 mention -- I didn't mention the Bar.
22 MR. JOHNSON: Well, you --
23 MR. GANT: That was your -- that was
24 your --
25 MR. JOHNSON: You continually accuse me of

Page 12

1 unethical or immoral behavior, and it's just
2 gotten to the point where, yeah, it is personal,
3 and it shouldn't be. I mean, I'm not -- okay.
4 That's enough.
5 MR. GANT: If it's designed to harass my
6 client, and to harass my client's COGIC, and to
7 put them in a bad light, doing it on purpose and
8 intentionally, then I think that's improper.
9 MR. JOHNSON: Okay.
10 MR. GANT: Is it a bar complaint status? I
11 don't -- I'm not sure. But you are doing that.
12 You have done that more than once.
13 MR. JOHNSON: Okay. I'm going to ask
14 again, and if you're going to -- if you're going
15 to instruct him not to answer, I would request
16 that you do so clearly.
17 BY MR. JOHNSON:
18 **Q Okay. Bishop, do you own any properties in**
19 **Escambia County, Florida, other than the home you've**
20 **referenced earlier?**
21 A Asked and answered.
22 **Q Well, no, it wasn't answered. Respectfully**
23 **you told me you owned a home in Escambia County,**
24 **Florida. For example, I own a home in Escambia**
25 **County, Florida. But I also happen to own other**

Page 13

1 **properties in Escambia County, Florida. So it's**
2 **perfectly conceivable that one may own a home in**
3 **Escambia County, Florida, as well as other properties**
4 **in Escambia County, Florida.**
5 **So I'll ask again. Other than the home**
6 **that you've referenced earlier, do you own any**
7 **properties in Escambia County, Florida?**
8 A As you've been talking, it came back to my
9 remembrance here that I do -- I recently purchased
10 another piece of property here in -- and it is in
11 Escambia County because it's in Century, Florida. But
12 if you ask me for the address, I can't give you the
13 exact address.
14 **Q Okay. No problem.**
15 A But other than that, I own no other
16 property in Escambia County, Florida.
17 **Q Now, where were you born?**
18 A I was born in the same town I live in, I've
19 worked in, I retired in, the little town of Quincy,
20 Florida.
21 **Q You went to high school there?**
22 A Graduated at the top of my class James A.
23 Shanks High School.
24 **Q What year did you graduate?**
25 A 1972.

Page 14

1 Q Okay. What did you do after high school?

2 A Went to college.

3 Q Where did you go to college?

4 A University of South Florida, Florida State

5 University.

6 Q Did you graduate from University of South

7 Florida with a degree?

8 A I did.

9 Q What year and what was the degree?

10 A Irrelevant, but I don't mind telling you.

11 And if you want to spend all day on this, we can.

12 Graduated from the University of South Florida 1976

13 with a bachelor's degree. Graduated from Florida

14 State University with a master's in ed leadership, I'm

15 not sure of the year, maybe 1999. I also have a

16 doctorate in theology from -- oh, I can't even think

17 of the seminary right now. But those are the degrees

18 I have. I've attended Florida State University law

19 school, as well as Abraham Lincoln University law

20 school.

21 Q Okay. Back to South Florida, when you got

22 your bachelor's degree, what was the discipline?

23 A Education, English education.

24 Q Okay. All right. The law schools that you

25 just mentioned attending, did you obtain a degree from

Page 15

1 either one of those?

2 A I have not.

3 Q Okay. All right. And I know you just said

4 you can't remember, but if the name of the seminary

5 that you went to, if you recall that during the course

6 of today's deposition, can you agree to let me know?

7 A I'm not going to spend any time trying to

8 recall it. I don't remember the name of the seminary

9 at this point. I'm sure if -- if it comes to me, I'll

10 do it.

11 Q Okay.

12 A I didn't pull down all of my degrees in

13 anticipation that I would have to respond to that

14 today.

15 Q Upon graduation from seminary, were you

16 ordained as a minister?

17 A I was ordained as a minister before I

18 graduated from seminary.

19 Q Tell me a little bit about that. Not being

20 a member of any particular denomination, I am under

21 the impression that ordination may be different from

22 denomination to denomination, or what have you. So

23 tell me about which denomination or church you were

24 ordained in and what that process is.

25 A I was licensed, ordained and consecrated in

Page 16

1 the Church of God in Christ. I was licensed at about

2 17 or eight -- in fact, I was licensed and -- I can

3 tell you exactly when I received my license in the

4 Church of God in Christ. It was in April or May of

5 1972. I remember that because I graduated from high

6 school in May of 1972, and I received a license as a

7 licensed minister in the Church of God in Christ

8 before I graduated from high school in 1972.

9 So I was licensed by the Church of God in

10 Christ in 1972. I was ordained by the Church of God

11 in Christ and received, and still have my certificate

12 of ordination from the Church of God in Christ, in

13 1976, I believe.

14 Q What is the difference between being

15 licensed by Church of God in Christ and being ordained

16 by Church of God in Christ?

17 A Being a licensed minister in the Church of

18 God in Christ certifies that you have been recommended

19 by your local pastor as having met all of the

20 requirements that are required in the constitution of

21 the Church of God in Christ that a minister must have.

22 The knowledge, the competency of understanding the

23 basic rules and regulations of the Church of God in

24 Christ, that your life meets the requirements in terms

25 of integrity and virtue, that you have passed,

Page 17

1 according to the pastor who recommends you, a

2 screening in terms of your ability -- criminally and

3 other things, whether or not you've had anything

4 criminally in your past.

5 So it comes from the -- it starts with the

6 pastor of the local church who recommends you to

7 become a licensed minister, after you've gone through

8 the basic teaching and training required by a church.

9 And then he certifies -- when you are recommended for

10 ordination, the pastor certifies to the bishop that

11 you've met those qualifications. And you are, in

12 turn, evaluated by an ordination committee, again, to

13 make sure that you have the basic understanding and

14 that you can represent the Church of God in Christ as

15 an ordained elder, qualified to carry on the

16 ordinances and perform weddings and funerals and other

17 functions that only an ordained elder can perform in

18 our church.

19 Q Understood.

20 A Again, I see these questions, of course, as

21 irrelevant. And if you want to take the time for me

22 to answer these kind of questions, that's fine, but

23 I'd much rather be answering questions about the

24 subject matter of this complaint.

25 Q How old were you when you got licensed?

Page 18

1 A I told you that, but you weren't listening.
2 I was 18.
3 Q Okay. That's quite an accomplishment that
4 you're -- was that unusual for an 18-year-old to get
5 licensed at that point in COGIC?
6 A It would be unusual, but it's not strange
7 in the sense that you may be thinking that it's
8 strange. You've got to go through a course of study.
9 You've got to be well trained by the person who is
10 your pastor. And you've got to be able to follow
11 through on the course of study that's provided.
12 Q Okay.
13 A There are specific things that you have to
14 show that you have knowledge of.
15 Q Okay.
16 A I was an excellent student in school in
17 academic and intellectual world, and I gave my life to
18 Christ, , totally committed myself to him. And I've
19 been that way all of my life, regardless of what you
20 or anybody else think about me. I am dedicated to the
21 principles of the Bible, first of all, and to what the
22 Bible represents. And so I gave myself to studying
23 those things.
24 Q Have you been with -- affiliated with
25 COGIC, for lack of a better word, using the word

Page 19

1 affiliated, I guess, throughout your entire career?
2 A What do you mean, career? Are you talking
3 about in terms of as a minister?
4 Q Yes.
5 A My entire ministerial career has been spent
6 with the Church of God in Christ.
7 Q Have you been employed in any other
8 capacity other than as a minister with the Church of
9 God in Christ?
10 A I've never been employed by the Church of
11 God in Christ. I consider my service as an avocation.
12 I serve -- I'm not a salaried employee of the church.
13 I'm not a salaried minister of the church. I have
14 always given my time freely in exchange for donations
15 and contributions and love offerings that the church
16 has given me over the years. But I've never been
17 employed by the Church of God in Christ, as I
18 understand the use of the word "employed." I've been
19 a member and a servant of the Church of God in Christ,
20 and will continue to be such until I'm either removed
21 or die.
22 Q Have you ever been employed in any capacity
23 by an employer?
24 A I've spent my secular career as an
25 educator, classroom teacher, coach, principal,

Page 20

1 administrator.
2 Q And whom have you worked for in those
3 capacities?
4 A As all of my educational career, I've
5 worked for the Gadsden County School Board, except for
6 a brief time when I worked with Tallahassee Community
7 College.
8 Q What years did you work for the Gadsden
9 County School Board?
10 A 1976 until probably 2007 or '8. I can't be
11 very clear on the date that I actually ended my
12 services with the Gadsden County School Board.
13 Q Okay. During that period of time, what was
14 your position with them?
15 A You weren't listening again. Teacher,
16 coach, principal, administrator.
17 Q Okay. What school were you a teacher at?
18 A I can't remember them all, and I'm not
19 going to try to waste time, because I sure did a --
20 quite a few of those schools during that 31- or
21 '2-year career.
22 Q What school were you a principal of?
23 A Principal of Gadsden -- Gadsden Academy, I
24 believe. Don't -- don't hold me to that exact name,
25 but I believe it was Gadsden Academy, Carter-Parramore

Page 21

1 Academy, and Chattahoochee High School. Those are the
2 schools that I remember serving as principal.
3 Q Okay. What years were you the principal at
4 the Gadsden Academy?
5 A That would have been 2007 or '8. I'm not
6 sure of the date, again. I see all of this as being
7 irrelevant, but I did work in -- in fact, that was the
8 last school that I worked at, Gadsden Academy.
9 Q What years were you the principal at the --
10 did you -- I think you used the word Parramore
11 Academy?
12 A Carter-Parramore Academy.
13 Q Uh-huh.
14 A I can't remember the exact years, but it
15 would have been somewhere between 2005 to 2006 or '7,
16 I served there, first of all, as assistant principal.
17 Q And I think the last one you mentioned was
18 Chattahoochee High School?
19 A Chattahoochee High School. That was
20 actually a combination school. That would have been
21 around 2003 or '4, somewhere in that category.
22 Q All right. And I think you testified
23 earlier that you stopped working for the Gadsden
24 school board around 2007 or 2008; is that correct?
25 A That is correct.

Page 22

1 Q And what were the circumstances under which
2 you left employment with the Gadsden school board?
3 A I retired.
4 Q Since '07 and '08, have you had any other
5 employers?
6 A No other employers. None.
7 Q Throughout your adult life, then, have you
8 had any other employers that we haven't spoken about
9 today?
10 A I'm sure I have. I started working at the
11 age of six years old. I worked until I graduated from
12 high school. I came up working on a tobacco farm.
13 I've done any number -- I did any number of jobs as a
14 college student, as an adult, from concrete
15 construction to roofing repair, to working as a city
16 employee for the City of Tampa. If you push me about
17 dates and times -- but those were jobs I held as a
18 student.
19 Q Let me rephrase my question again, because
20 it's not my intention to ask you to remember all of
21 those. What I meant to ask was post education, when
22 you were no longer a student, have you had any other
23 employment other than what you've already told me?
24 A No. None that I can recall.
25 Q Got you. Okay. Have you had any other

Page 23

1 education other than what we've already talked about?
2 A None. No formal education that I can
3 recall.
4 Q Got it. Something I should have done
5 before we started is --
6 A Slidell Baptist -- Slidell Baptist Seminary
7 was the name of the school that I received my
8 doctorate from. I didn't waste any time on it, but it
9 suddenly popped back in my head.
10 Q I'm not going to make any assumptions, so I
11 understand that I'm likely going to ask a lot of
12 questions today that you think are obvious or
13 apparent. All I can represent to you is it's a
14 mistake, in my opinion, for any lawyer to make any
15 assumptions that I know something.
16 So my question is, Slidell Baptist
17 Seminary, is that in Slidell, Louisiana?
18 A Yes.
19 Q Did you attend any other seminaries?
20 A No.
21 Q Okay. And I should have given you a little
22 bit of preliminary instruction, and I forgot. I
23 apologize for that. What -- and I realize you may
24 have been through something similar to this before.
25 Have you given deposition testimony before?

Page 24

1 A I have.
2 Q Okay. As you may recall, then, this is an
3 opportunity for counsel in the case to essentially ask
4 you questions and find out things that we don't know,
5 find out things that we just need to confirm, that we
6 feel are relevant to the case or could lead to
7 something that's relevant in the case.
8 I realize that you don't believe me, but
9 I'm not going to ask you any questions today that --
10 where the intention is to embarrass or harass you.
11 And I'm undoubtedly going to ask you some questions
12 today that you may not understand. It's not my --
13 it's not my intention or my wish that you answer a
14 question you don't understand.
15 If I ask you a question, and you don't
16 understand the question -- which doesn't mean you
17 don't understand why I'm asking, it's more you just
18 don't know how to answer because you don't understand
19 the question -- I want you to advise me that, so I
20 have an opportunity to rephrase my question in perhaps
21 another way. Can you agree to do that?
22 A I understand that one of your primary
23 purposes is to play this for social media, put it out
24 there on somebody's jive show and give it to Moses
25 Tyson, Jr. And I understand that, from my

Page 25

1 perspective, a lot of what you want to do is try to
2 embarrass me or try to embarrass the Church of God in
3 Christ in some way or another. If your intent is to
4 get evidence or information relative to the case, I'm
5 going to be glad to answer all of your questions. I'm
6 not going to answer any question from you that I
7 believe is designed to embarrass me. And I'm going to
8 ask the attorney to object and I'm not going to answer
9 any of those questions. You and your clients have
10 spent a lot of time trying to denigrate me and
11 embarrass me on social media. You put out a lot of
12 stuff.
13 I listened as you talked claiming that you
14 didn't have a social media page and you didn't have --
15 didn't know who -- you didn't send stuff out there,
16 but I think when the time comes, we'll be able to
17 demonstrate that you and your clients have done just
18 that in reference to trying to have this case heard in
19 social media. I have not responded to any of it and I
20 will not respond to any of it because the courtroom is
21 the proper place to decide the matters that we're
22 talking about.
23 So if you try to embarrass me, I'm not
24 going to respond, and I'll ask the attorney to object,
25 and we'll allow the judge to respond to the objection.

Page 26

1 But I will not be embarrassed.

2 Q I'm going to ask again, if I ask you a
3 question and you don't understand the question, will
4 you agree to advise me of that, so I have an
5 opportunity to rephrase the question in the hope that
6 it's better phrased for your understanding, before you
7 answer?

8 A I've already answered your question.

9 Q Respectfully, you did not answer my
10 question. My question is -- well, let me ask it this
11 way. If I ask you a question and you provide an
12 answer without asking me to rephrase the question, can
13 we assume for the record that you understood the
14 question and answered accordingly?

15 A You can. If I answer your question, you
16 can assume that I understood your question.

17 Q Okay. Do you understand that at any time
18 during this proceeding, you're welcome to ask us to
19 take a break? Whether you need to use the restroom,
20 get something to drink, talk to your attorney, it's
21 all perfectly fine. And you just need to let us know.

22 A I'm good. I'm waiting on you.

23 Q But do you understand that as we're here
24 today, you can take a break anytime you need to?

25 A I'm good.

Page 27

1 Q All right. If I ask you a question and you
2 don't know the answer -- and that is likely to happen.
3 It happens in every deposition, that I'm aware of,
4 where a witness won't know the answer, you just don't
5 know. It's perfectly okay to tell me that, that you
6 just don't know. Is -- do you understand that?

7 A I understand that, and I know there will be
8 some questions that you'll ask that I don't know the
9 answer to.

10 Q And I --

11 A And I'll --

12 Q -- just want you to know, that's perfectly
13 fine.

14 A I'll tell you.

15 Q Okay. All right. And, again, I know you
16 don't want to answer this, but if I don't under -- if
17 you don't understand a question, I'm requesting that
18 you let me know so I can rephrase.

19 Finally, do you understand that you've been
20 sworn in to tell the truth, you know, through an oath,
21 just like we were in a courtroom?

22 A Unlike you and what some of your clients
23 have done, I'm going to tell the truth. I'm not going
24 lie about anything that I say here today, nor would I
25 lie about anything that I put in the case already.

Page 28

1 Q Okay. All right. But do you understand
2 you're sworn in to tell the truth today, just as if
3 we're in a courtroom?

4 A Asked and answered.

5 Q Well, it wasn't asked -- it wasn't
6 answered. Sir, you can say that and your lawyer can
7 say that all you want, but the record is what the
8 record is. It's a yes or no question. Do you
9 understand that you've been sworn in to tell the truth
10 just as if we were in a courtroom?

11 A Unlike you and your clients, if you ask me
12 a question, I'm going to tell you the truth.

13 Q So are you refusing to answer that
14 question?

15 A I've already answered it.

16 Q Okay.

17 MR. JOHNSON: Certify that question as
18 well.

19 BY MR. JOHNSON:

20 Q All right. While you were employed with
21 the Gadsden County School Board, were you ever
22 disciplined in any way?

23 A Irrelevant, but I don't mind answering --

24 MR. GANT: I object to that question.

25 Irrelevant, I object to it. That question --

Page 29

1 what is the basis of the question? Our complaint
2 is based on the tenements, the rules, against the
3 bishop of Church of God in Christ. The rules
4 and -- the rules and bylaws. It's a
5 black-and-white issue as to what the rules are.
6 There's a record of what was done by your
7 client -- discipline in his past employment has
8 no relevance at all as to issues in this case.

9 Committed a crime? Maybe so. If he gets
10 convicted of a crime -- convicted of a crime?
11 Sure. Credibility? Sure. Completely sure.
12 Discipline, talked about, bad-mouthed? No, no,
13 no, no. It's designed to harass my client, put
14 it on social media, as suggested earlier, and
15 we're not going there, Mr. Johnson. We're not
16 going to do it. Certify it to the judge. It's
17 fine with me.

18 MR. JOHNSON: Are you instructing him not
19 to answer?

20 MR. GANT: Yes, I am.

21 MR. JOHNSON: Certify the question.

22 THE WITNESS: He doesn't have to instruct
23 me not to answer that question. I'm not going to
24 answer that question or any question like that
25 because it's irrelevant.

Page 30

1 BY MR. JOHNSON:
2 Q Is it your position for the Court that you
3 decide what's relevant in the case and what's not
4 relevant?
5 MR. GANT: I object. You're asking the
6 client to make a legal conclusion, interpretation
7 of the law, and that is an improper question.
8 MR. JOHNSON: He just made a legal
9 conclusion on the record. So I think I'm
10 entitled to follow up on that. He just stated on
11 the record that he thinks it's irrelevant. And
12 by your own statement, that's a legal conclusion.
13 So I have a right to follow up and ask him
14 what --
15 MR. GANT: What was your question, sir?
16 BY MR. JOHNSON:
17 Q Are you under the impression that it's
18 your -- it's your right or your position to decide
19 what is relevant or not relevant in this case?
20 A No, but it's my position and I believe it's
21 my right to answer a question or not answer a question
22 if I believe it to be irrelevant.
23 Q That's your understanding?
24 A That's my understanding, that I don't --
25 Q Okay.

Page 31

1 A -- that I'm not going to -- that I don't
2 have to answer a question that is irrelevant to what
3 our discussion is about.
4 MR. GANT: But let me make clear, my
5 objection is that is designed to harass my
6 client, put him in -- it puts him in a bad light.
7 That's my objection, as his counsel.
8 MR. JOHNSON: All right. And just for the
9 record, the question was asked for simple
10 background information that I believe we're
11 entitled to, as we pick a jury in this case.
12 And -- and it's also reasonably calculated to
13 potentially lead to admissible evidence.
14 BY MR. JOHNSON:
15 Q Now, throughout your tenure at COGIC, have
16 you ever been disciplined?
17 A Throughout my COGIC -- throughout my tenure
18 at COGIC, have I ever been disciplined? Not as I
19 remember.
20 Q Fair enough. Have you ever been arrested?
21 A Been arrested twice in my life. One for --
22 MR. GANT: I object. That is the extent --
23 THE WITNESS: Go ahead.
24 MR. GANT: He answered the question, and
25 just said twice, and that's his answer. Beyond

Page 32

1 that, it's being intrusive to my client and
2 designed to harass him. It's clear as glass,
3 clear as glass.
4 MR. JOHNSON: It's your position on the
5 record here that asking a witness in a case
6 whether they've ever been arrested is intrusive,
7 that's your --
8 MR. GANT: It's an --
9 MR. JOHNSON: -- position.
10 MR. GANT: It's an improper question.
11 MR. JOHNSON: Okay. That's your position.
12 MR. GANT: Certify it.
13 MR. JOHNSON: It is.
14 MR. GANT: He answered.
15 BY MR. JOHNSON:
16 Q Okay. All right. When was the first time
17 you were arrested?
18 MR. GANT: Don't answer the question.
19 A Already answered.
20 MR. JOHNSON: Are you telling him not to
21 answer?
22 MR. GANT: Yes, I am.
23 MR. JOHNSON: I'm going to ask -- this is
24 the way it's supposed to work, Mr. Gant.
25 MR. GANT: Sure.

Page 33

1 MR. JOHNSON: I'm going to ask the
2 question. If you have an objection, and tell him
3 not to answer, that's great. That's an awesome
4 job. That's your job.
5 MR. GANT: Thank you.
6 MR. JOHNSON: But you have to let me ask
7 the question.
8 MR. GANT: I will. I will.
9 MR. JOHNSON: Okay? And I just -- I just
10 ask, going forward, that we be patient with each
11 other. There are certain questions I'm going to
12 ask that you're not going to like. It's
13 definitely within your right to tell your client
14 not to answer, I respect that.
15 MR. GANT: Thank you.
16 MR. JOHNSON: I just want to be able to ask
17 the question without being personally attacked.
18 MR. GANT: You're not being attacked,
19 Mr. Johnson. No, I'm not attacking you.
20 MR. JOHNSON: All right.
21 BY MR. JOHNSON:
22 Q The second time you were arrested, when did
23 that happen?
24 MR. GANT: Object.
25 MR. JOHNSON: Okay. I'm going to

Page 34

1 certify -- are you telling him not to answer?
2 MR. GANT: Yes, I am.
3 MR. JOHNSON: Okay. And I'd also request
4 that when you -- when you do object and you're
5 telling your client not to answer, that you do
6 so, so I understand. Okay?
7 MR. GANT: I will. Thank you.
8 BY MR. JOHNSON:
9 **Q All right. I'm going to go back to the**
10 **first time you were arrested. Was it in the state of**
11 **Florida?**
12 MR. GANT: I object. Don't answer the
13 question, Mr. Green.
14 BY MR. JOHNSON:
15 **Q The first time you were arrested, what**
16 **county and state was it in?**
17 MR. GANT: I object. Mr. Green, don't
18 answer that question.
19 BY MR. JOHNSON:
20 **Q The second time you were arrested, was it**
21 **in the state of Florida?**
22 MR. GANT: I object. Don't answer the
23 question, sir, please.
24 BY MR. JOHNSON:
25 **Q When -- the second time you were arrested,**

Page 35

1 **what county and state was it in?**
2 MR. GANT: I object on the basis that it's
3 designed to harass my client. And the
4 question -- don't answer the question, sir. I
5 instruct him not to answer.
6 BY MR. JOHNSON:
7 **Q What is your date of birth?**
8 A February the 5th, 1954. I'm 69, marching
9 towards 70. Sixty-nine marching towards 70.
10 **Q I'm not going to ask you for your Social**
11 **Security number.**
12 A I'm not going to give it to you.
13 **Q I'm not going to ask for it. What are the**
14 **last four digits of your Social Security --**
15 A I'm not going to give you any digits of my
16 Social Security number.
17 MR. GANT: I object.
18 MR. JOHNSON: Are you instructing him not
19 to answer.
20 MR. GANT: I am.
21 MR. JOHNSON: Okay. All right.
22 And for the record, Social Security numbers
23 are a very common question for all witnesses in a
24 case, in order for parties to be able to verify
25 background information. It's not -- for the

Page 36

1 record, I'm not doing it to be intrusive, which
2 is why I'm not asking for his entire Social
3 Security number, because I am very sympathetic to
4 the fact that we don't like these things out
5 there. My intention was only to ask for the last
6 four digits so I can make sure that if we do have
7 records or obtain records through discovery, that
8 I can match them up for Mr. Green.
9 MR. GANT: I object. Mr. Johnson, that is
10 disingenuous. I think it's not the norm in a
11 civil case when -- when they're not a party to
12 the case, to ask for such information. He's not
13 a party to the case. I think it's improper, and
14 you know that, for the record.
15 MR. JOHNSON: Okay. Certify the question.
16 BY MR. JOHNSON:
17 **Q Okay. I apologize if you've answered this.**
18 **You did tell me you've been arrested twice. Have you**
19 **ever been convicted of a crime?**
20 A Never.
21 **Q All right. Have you ever been a party to a**
22 **civil lawsuit?**
23 A I'm a party to a civil lawsuit now with you
24 and your clients. Defamation, as you know.
25 **Q Other than the defamation case --**

Page 37

1 A I have, yes.
2 **Q Okay. Please tell me the case title.**
3 MR. GANT: Object. Object. Intrusive,
4 harassment, designed to put my client in a bad
5 light. And we reiterate, which should be soon --
6 shown later on, your proclivity and your
7 insistence in trying this case through social
8 media, and your attempt to do so with those
9 people that you know, such as Moses Tyson in
10 particular. Okay? And for those reasons, I
11 order my client not to answer the question.
12 MR. JOHNSON: You understand I didn't ask a
13 question yet. Do you understand I haven't even
14 asked a question? Do you understand that,
15 Mr. Gant?
16 MR. GANT: What did you say, Mr. Johnson?
17 MR. JOHNSON: Because at some point --
18 MR. GANT: What was your --
19 MR. JOHNSON: -- we might -- okay. I'm
20 just stating this because --
21 MR. GANT: What was your question?
22 MR. JOHNSON: No. Mr. Gant, you're not
23 going to intimidate us.
24 MR. GANT: What was your question?
25 MR. JOHNSON: My question would have been

Page 38

1 and is going to be, what is the case style of --
2 MR. GANT: You asked -- you made those
3 comment, what's the case style, you asked that
4 question, and I objected at that point in time.
5 But play it back, the court reporter, she'll tell
6 you.
7 MR. JOHNSON: I'm in the middle of a
8 question.
9 MR. GANT: And what you said was improper
10 questioning designed to harass my client. I
11 objected at the appropriate time, Mr. Johnson.
12 It was time to object to it at that moment,
13 before you go out there and testify.
14 MR. JOHNSON: I didn't finish the question.
15 MR. GANT: You can't just testify -- I
16 don't want you testifying in this case. You
17 don't have to testify, sir. I don't want you
18 testifying. You're not a witness.
19 MR. JOHNSON: Okay. All right. Again, I'm
20 going to ask that you let me get my question
21 out --
22 MR. GANT: If it's proper and if you're not
23 testifying. You want to put things in the record
24 for your benefit under the guise of a question so
25 it will be there. I'm not going to play that

Page 39

1 game, Mr. Johnson, with you. We're not going to
2 do it today.
3 MR. JOHNSON: If you feel that I'm doing
4 things improper, you do understand that it's
5 your -- presumably -- I don't know this for a
6 fact from a legal standpoint, but I'm presuming
7 it's within your right to stop the deposition and
8 seek direction or rulings from the Court. And I
9 would request that you do so, so that we, all of
10 us here, do not waste our time and money and
11 because -- let me finish, please. Because my
12 clients are going to considerable expense
13 relative to legal fees, fees related to the court
14 reporter, to the videographer, et cetera. And
15 what I'm doing now is I'm inviting you to save
16 all of this time and money, if you reach a point
17 where you feel that it's appropriate, because I
18 don't want to waste your time or Bishop Green's
19 time either. That's my request.
20 Now, I'm going to ask -- again, I would
21 like to be able to ask my questions. And when I
22 finish my question, you absolutely have a right
23 to object, and you certainly have a right to tell
24 your client not to answer. But I have a right to
25 ask questions that I feel are arguably relevant

Page 40

1 to this case and to background information
2 regarding any witness. And credibility and
3 background information cases (sic), to my
4 knowledge, are appropriate and allowable. And if
5 I thought otherwise, I wouldn't ask the question.
6 So -- and I'm not testifying. I'm trying
7 to work something out with counsel on the record
8 so we can proceed with discovery in the case.
9 Would you like to say anything else before
10 I resume my questions?
11 MR. GANT: Yes, I -- yes, I would,
12 Mr. Johnson.
13 Mr. Johnson, as I said, some of your
14 questioning is being poised in, oh --
15 saying that, oh, issue -- or saying attorneys do
16 like -- in the course of being like "when is the
17 last time you beat your wife --"
18 MR. JOHNSON: I didn't ask that.
19 MR. GANT: -- or "when did you stop beating
20 your wife." Your questions along those lines are
21 being disguised as questions, but at the same
22 time, you're testifying. You're putting it under
23 a predicate that's not true, and he can't respond
24 to. You don't even care whether he responds to
25 it or not, you want to lay the predicate to put

Page 41

1 it on the record, as like "Have you stopped
2 beating your wife, sir?" You know, like you're
3 suggesting my client beat his wife. Or any
4 client, for that matter. I'm not playing that
5 game, Mr. Johnson, today. I can't --
6 As far as stopping the deposition, you can
7 also stop the depo, also, on your own. You can
8 do that, too. Take it to the judge and certify
9 the questions. That would also save yourself
10 time, and your client's time and money. You can
11 also do the same thing that I can do, okay?
12 MR. JOHNSON: Uh-huh.
13 MR. GANT: The ball is in your court also.
14 MR. JOHNSON: Uh-huh.
15 MR. GANT: I'm not going to play the game
16 of trying to put my client in a bad light for a
17 social media heyday. We're not going to play
18 those games. If I'm wrong, the judge will tell
19 me. I understand that, too, okay?
20 MR. JOHNSON: Uh-huh.
21 MR. GANT: So conduct yourself
22 accordingly --
23 MR. JOHNSON: Okay.
24 MR. GANT: -- based on what I just told
25 you. If you think the question, "Sir, when is

Page 42

1 the last time you beat your wife" is an
2 appropriate question, you think those type
3 questions are appropriate in this context,
4 then you -- I don't. Okay?

5 MR. JOHNSON: I think the record will
6 reflect that I haven't accused him of anything,
7 nor have I asked him if he ever beat his wife.

8 MR. GANT: I was suggesting a parity,
9 Mr. Johnson, not your question to him. That was
10 an example of what you're trying to -- to -- to
11 get -- do in this case.

12 MR. JOHNSON: I'm going to ask my
13 questions. Okay.

14 BY MR. JOHNSON:

15 Q Have you ever been a party to a civil suit
16 other than the defamation case you referenced earlier?

17 A Yes.

18 Q Okay. How many civil suits have you been a
19 party to?

20 A Can't remember.

21 Q Okay. The first civil suit that you were a
22 party to, what county and state was it in?

23 A Can't remember.

24 Q Is that your honest answer under oath?

25 A Unlike you and your clients, I'm going to

Page 43

1 tell you the truth. I can't remember, and that's the
2 truth.

3 Q Okay. I'm going to ask -- I'm going to
4 broaden the question. Other than the defamation case
5 that you referenced earlier that involves myself and
6 some of my clients, do you recall the approximate
7 dates of any of those civil cases?

8 A Can't remember.

9 Q Okay. Other than the defamation case
10 involving myself and my clients, can you remember the
11 state and the county in which any of your prior civil
12 matters were filed in?

13 A I'm sure most of the cases that I've been
14 involved in have been filed in the state of Florida
15 with the exception of one, I think, that was filed in
16 Alabama.

17 Q Do you remember what county in Alabama?

18 A I can't remember -- in Alabama? Don't
19 remember the name of the county, no.

20 Q Do you remember the city?

21 A Monroeville.

22 Q Do you remember approximately when that
23 was?

24 A I can't remember exactly.

25 Q Uh-huh.

Page 44

1 A And I'm not going to give you an
2 approximate answer.

3 Q Okay. What counties in the state of
4 Florida have you been a party to in civil matters?
5 Other than Escambia, I'm aware of Escambia.

6 MR. GANT: I object to the questioning.
7 It's totally irrelevant. It's totally designed
8 for purposes other than trying to -- the laws and
9 rules of our system allow you to ask questions
10 about, Mr. Johnson, totally irrelevant.

11 MR. JOHNSON: Are you instructing him not
12 to answer?

13 MR. GANT: Yes, I am.

14 MR. JOHNSON: Okay.

15 MR. GANT: Don't answer the question, sir.

16 MR. JOHNSON: Just so I -- I'm trying to
17 make this a little easier for the court reporter,
18 is I would like to state on the record that I'm
19 going to certify each objection made by opposing
20 counsel during the course of the deposition.
21 That way I don't have to keep repeating myself.
22 Okay.

23 BY MR. JOHNSON:

24 Q Okay. What is your title now with COGIC?

25 A Bishop.

Page 45

1 Q Okay. As bishop, do you have any other
2 titles?

3 A I don't understand your question. You
4 asked me what my title is with COGIC. My title is
5 bishop.

6 Q Okay. Am I correct that COGIC, at least in
7 the United States, is divided up into separate
8 jurisdictions? Is that accurate?

9 A I think you know that COGIC is divided up
10 into separate jurisdictions because you've had
11 experiences in litigation involving COGIC. And so to
12 say that you think you're correct, I would agree that
13 you are correct, it is divided up into separate
14 jurisdictions.

15 Q Okay. One of those jurisdictions is called
16 or referenced as Northwest Florida Jurisdiction; is
17 that correct?

18 A That is correct.

19 Q Okay. And what is your position relative
20 to the Northwest Florida Jurisdiction?

21 A I already answered.

22 Q Do you understand the question?

23 A I understand your question. I answered
24 your question when you asked me what position do I
25 have with COGIC, I told you bishop.

Page 46

1 Q Okay. Are you the only bishop of COGIC?

2 A I consider that question to be an insult

3 because you know that COGIC has -- as you just said,

4 it's divided into several jurisdictions, and of course

5 I can't be the only bishop in COGIC. So the answer to

6 your question is obviously no.

7 Q Okay. Are -- can you give me the name of

8 any other bishop in COGIC?

9 A I can give you the name of quite a few

10 bishops in COGIC, but --

11 Q I'm asking you to give me one, please.

12 A I can give you the name of one other bishop

13 in COGIC, if that's all you want.

14 Q That's all I want.

15 A All you want is another bishop. Bishop

16 Steve Collins.

17 Q Okay. Does Bishop Steve Collins have a

18 position in COGIC relative to Northwest Florida

19 Jurisdiction?

20 A He does.

21 Q What is his position relative to Northwest

22 Florida Jurisdiction?

23 A His position is that of superintendent and

24 pastor.

25 Q Okay. So in the same vein, I am asking you

Page 47

1 what is your position within Northwest Florida

2 Jurisdiction?

3 A Within the Northwest Florida Jurisdiction,

4 I am the bishop over the jurisdiction.

5 Q Okay. Thank you.

6 A I told you that earlier.

7 Q Okay. You seem very angry today --

8 A Not angry --

9 Q -- what's going on?

10 A Not angry at all. I love you and everybody

11 in here.

12 Q Okay.

13 A I just found it offensive that you tried to

14 use the name of Jesus in trying to conduct prayer, at

15 the same time you have all of these negative issues.

16 I'm not angry with anybody. And when you're angry,

17 you lose your composure, and when you're angry, it's

18 next to insanity, and I try not to ever be angry.

19 Q As bishop of Northwest Florida Jurisdiction

20 within COGIC, what are your duties and

21 responsibilities?

22 A Supervision primarily.

23 Q All right. Supervision of what?

24 A Of the churches, the ministries, the

25 programs, the departments, the districts, and all of

Page 48

1 the personnel in the Northwest Florida Jurisdiction.

2 Q What are the districts within Northwest

3 Florida Jurisdiction?

4 A We have seven or eight. I can't think of

5 all -- the name of each district at this point, but we

6 have seven or eight districts.

7 Q Okay. What are the districts? I mean, you

8 don't have to -- I understand you can't give me the

9 names, but what is a district?

10 A A district usually consists of two or three

11 churches functioning as a unit within the jurisdiction

12 itself.

13 Q Okay.

14 A Led by a superintendent, district

15 missionary, and include other pastors and officers.

16 Q Okay. Westside Church of God in Christ of

17 Escambia County Florida, Inc., what jur -- or what

18 district was that church in as being in the

19 jurisdiction of Northwest Florida Jurisdiction?

20 A It's in the same district I believe that it

21 was in -- well, at that time it was -- I can't even

22 think of the name of the district, to think about it.

23 It was led by Superintendent -- Superintendent

24 Johnson, and I can't think of the name of that

25 district at this point.

Page 49

1 Q Okay.

2 A And I apologize for that.

3 Q That's okay. Does each district have a

4 distinguishable name then?

5 A Each district has a distinguishable name,

6 such as the district that -- and it almost came to me.

7 If I think long enough, the district will come to me,

8 but -- such as Northwest Florida District. There is a

9 district called Northwest Florida District. There's a

10 district called Evangelist -- Evangelistic District.

11 And there's a district that's Tristate. So each

12 district has a separate and distinct name.

13 Q Okay. Westside Church of God in Christ of

14 Escambia County, Florida, Inc., within the district

15 that that church was in, were there other churches

16 within that same district?

17 A Yes.

18 Q Okay. What are the names of those churches

19 that were in the same district as that?

20 A I can't remember each church that was in

21 that district. That district no longer exists at this

22 point. And I know it was Bethel Salone, maybe.

23 That's one that I can remember. And U.L. Johnson's

24 church, I can't think of the name of his church, but

25 he was a district superintendent. I'm not sure if his

Page 50

1 church is still operating, but he's no longer within
2 our jurisdiction, so...

3 Q Why does that district no longer exist?
4 A Why does that district no longer exist?
5 Because the district superintendent and the pastor
6 that were involved changed jurisdictions. They're no
7 longer in Florida Northwest.

8 Q What was the name of that superintendent?
9 A U.L. Johnson.

10 Q Okay.
11 THE STENOGRAPHER: What Johnson?
12 THE WITNESS: U.L. Johnson.

13 A And the church's name was New Warrington
14 Church of God in Christ.
15 BY MR. JOHNSON:

16 Q And Superintendent Johnson, to your
17 knowledge, is he still a superintendent, I guess,
18 within COGIC?
19 A Don't know.

20 Q Do you know what jurisdiction they
21 transferred to?
22 A Don't know.

23 Q Okay.
24 A Other than I know it was in Alabama. I
25 can't give you the name of that jurisdiction --

Page 51

1 Q Okay.
2 A -- because it's not something that I would
3 know off the top of my head.

4 Q When did that happen?
5 A Last year.

6 Q Do you know why U.L. Johnson and the New
7 Warrington Church changed jurisdictions?
8 A You would have to ask him.

9 Q Well, my question to you is --
10 A Do I know why? No.

11 Q Did you have any communication with him
12 relative to changing the jurisdiction?
13 A He communicated with the national church,
14 and I can't tell you why he changed jurisdictions.
15 The Church of God in Christ allows a church to
16 petition to transfer once a year from one jurisdiction
17 to another. He submitted a petition, and he was
18 allowed to transfer.

19 Q Okay. Did he ask you permission to seek
20 that transfer, as the Jurisdictional Bishop?
21 A He didn't have to ask my permission, he had
22 to follow the procedure outlined by the Church of God
23 in Christ.

24 Q Okay. Does a church wishing to transfer
25 jurisdictions need to contact you, as the bishop, and

Page 52

1 get your permission to transfer jurisdictions?
2 A They don't have to contact me and get my
3 permission to transfer it, but they have to go through
4 the process of completing the forms, submitting the
5 forms, and I will be copied on the forms that they
6 submit to the Church of God in Christ.

7 Q Okay. Have you ever had any of the
8 churches under your jurisdiction request a transfer
9 into another jurisdiction, other than the New
10 Warrington Church?
11 A I have.

12 Q Okay. I think you indicated earlier there
13 was another church in the local district that included
14 Pastor Watts' church, that may have moved. Was there
15 another one?
16 A There was.

17 Q What church was that?
18 A Bethel Salone.

19 Q Okay. Was that here in Escambia County?
20 A You know Bethel Salone, you represented
21 them at one point. That is in Escambia County.

22 Q And when did they transfer away from
23 Northwest Florida Jurisdiction?
24 A It would have been sometime last year. I
25 can't give you an exact date and month, but it would

Page 53

1 have been last year, 2023 perhaps -- 2022 perhaps.
2 Q Who was the pastor of that church at that
3 time?
4 A Michael Banks.

5 Q What jurisdiction did they transfer to?
6 A Can't tell you the answer to that question.
7 It was a jurisdiction in Alabama, same jurisdiction
8 U.L. Johnson transferred into.

9 Q Okay.
10 A To my knowledge.

11 Q All right. Do you know why Bethel Salone
12 transferred out of Northwest Florida Jurisdiction?
13 A You would have to ask them.

14 Q Well, do you know why?
15 A No. If I knew, I would tell you.

16 Q Has any source ever advised you why they
17 transferred?
18 MR. GANT: I object, because of
19 speculation, asked and answered.
20 BY MR. JOHNSON:

21 Q Has any source ever told you why Bethel
22 Salone transferred out of the jurisdiction?
23 A Asked and answered.

24 Q Are you refusing to answer the question?
25 A Asked and answered.

Page 54

1 **Q** **Are you refusing --**
2 MR. GANT: I object, arguing with the
3 witness. He says that --
4 MR. JOHNSON: I have a right to know if the
5 witness is refusing to answer. That's all.
6 MR. GANT: He gave an answer. Just play it
7 back. We're not going to -- we're not going
8 to -- we're not going to do this. You're not
9 going to intimidate me, Mr. Johnson. You're not
10 going to do that today, okay?
11 MR. JOHNSON: Okay.
12 MR. GANT: Nor my client, neither one of
13 us.
14 But for the record -- for the record, on
15 the record, we have Mr. -- to know who all's in
16 attendance today at the deposition, in
17 attendance. Pastor Watts, of course, another
18 defendant.
19 Good morning, ma'am.
20 Who is the other party here, the person
21 here, if I may ask? Who's the other person?
22 MR. JOHNSON: Oh. Ms. Felicia Watts-Kidd.
23 MR. GANT: Okay.
24 MR. JOHNSON: Did I pronounce that
25 correctly?

Page 55

1 MS. WATTS-KIDD: (Nods head.)
2 MR. JOHNSON: Okay.
3 MR. GANT: Thank you.
4 MR. JOHNSON: Okay. And for the record,
5 she's a board member of one of -- of the
6 defendant entity.
7 MR. GANT: Okay.
8 MR. JOHNSON: Okay. Are you alleging she
9 has no right to be here?
10 MR. GANT: Of course not.
11 MR. JOHNSON: Okay. Are you instructing
12 your client not to answer the last question?
13 MR. GANT: What's the last question? I'm
14 sorry, I don't recall.
15 MR. JOHNSON: I mean, I hate to do it, but
16 can you read it back to us, ma'am?
17 (The aforementioned testimony was read by
18 the reporter as recorded above.)
19 BY MR. JOHNSON:
20 **Q** **Has any source ever told you the reason why**
21 **Bethel Salone transferred out of the jurisdiction?**
22 A I think I've already answered it, but I
23 don't mind telling you again. No.
24 **Q** **Did Bethel Salone -- did any representative**
25 **of Bethel Salone notify you directly that they were**

Page 56

1 **wanting to transfer out of the jurisdiction?**
2 A They went through the process. They have
3 to complete forms -- complete forms and submit them
4 through the Church of God in Christ's portal. They
5 did not notify me directly. I was notified through
6 the process.
7 **Q** **Okay. Did anybody from Bethel Salone ask**
8 **your permission to transfer out of the jurisdiction?**
9 A You don't have to ask my permission to
10 transfer out of the jurisdiction. That's not part of
11 the process.
12 **Q** **Nevertheless, though, you tell me it's not**
13 **part of the process, and I don't disbelieve you. My**
14 **question is, did anybody from Bethel Salone ask your**
15 **permission to transfer out of the jurisdiction?**
16 A Asked and answered.
17 **Q** **Are you refusing to answer the question?**
18 A I already answered your question.
19 **Q** **Sir, you told me that it's not part of the**
20 **process. I'm sure you would agree with me that people**
21 **and entities often do things that aren't part of an**
22 **official process. Would you agree with me on that?**
23 A I've already answered your question.
24 **Q** **Sir, would you agree with me?**
25 A I've already answered your question.

Page 57

1 MR. GANT: Kind of speculation. Object,
2 what people seem to do sometime.
3 MR. JOHNSON: Okay.
4 MR. GANT: That's my objection --
5 MR. JOHNSON: Is your objection that it's
6 speculation to ask him -- I'm asking him to
7 speculate if somebody from Bethel Salone asked
8 his permission to leave the jurisdiction?
9 MR. GANT: I heard you say what people seem
10 to do sometime. What people seem to do
11 sometime --
12 MR. JOHNSON: Oh, I see.
13 MR. GANT: -- that phrase.
14 MR. JOHNSON: Understood. Understood.
15 Okay.
16 BY MR. JOHNSON:
17 **Q** **So I'm going to ask one last time. Did**
18 **anybody from Bethel Salone ask your permission for**
19 **them to leave Northwest Florida Jurisdiction?**
20 A Again, as part of the process in the Church
21 of God in Christ, you don't have to ask for permission
22 to go through the process of changing jurisdictions.
23 That's the process.
24 **Q** **Though it was not part of the process, did**
25 **anybody from Bethel Salone, nevertheless --**

Page 58

1 A I've answered your question.
2 Q -- ask -- can I finish my question, please?
3 A Go ahead.
4 Q And then if you and your counsel don't want
5 to answer, that's your right.
6 Did anybody from Bethel Salone ask your
7 permission to transfer out of the jurisdiction?
8 A I've already answered your question. It
9 may not be the answer that you want, but I've given
10 you my answer. I've given it to you at least twice.
11 Q Okay. All right. During your tenure as
12 bishop of Northwest Florida Jurisdiction, have any
13 other churches transferred out of your jurisdiction?
14 A I've answered that question as well, and
15 I'll answer it again. Yes.
16 Q Okay. What other churches have transferred
17 out of your jurisdiction?
18 A Can't go back through the list that have
19 transferred out over the years. And so at this point
20 I can't recall.
21 Q Who would have that information?
22 A The Church of God in Christ headquarters.
23 Q Who within the headquarters at Church of
24 God in Christ? And I'm not asking necessarily for a
25 specific person, but to your knowledge, is there a

Page 59

1 department within Church of God in Christ in Memphis
2 that would have the information relative to churches
3 that have may have transferred out of the jurisdiction
4 of Northwest Florida Jurisdiction?
5 A It is part of the job description for the
6 general secretary to maintain all records. Whether or
7 not he would have a record of that, you would have to
8 ask him, but that's his job. And that would be the
9 source that I would refer you to.
10 Q Okay. Have you ever been the bishop of any
11 other jurisdiction other than Northwest Florida
12 Jurisdiction?
13 A Never.
14 Q All right. The procedures relative to
15 transferring out of a jurisdiction that a local church
16 must adhere to, where are those to be found?
17 A They are found in the official manual of
18 the Church of God in Christ.
19 Q Okay. Now, I have with me a little black
20 book that says "Church of God in Christ Official
21 Manual." Of course, I'm not going to put this in the
22 record, it's too voluminous, but is this the document
23 basically you're referring to?
24 A That is the official manual of the Church
25 of God in Christ. There's also an additional book

Page 60

1 called the Book of Certified Amendments.
2 Q Are you familiar with the Book of Certified
3 Amendments?
4 A I'm familiar with both.
5 Q Okay. Would you say you've read them all
6 completely?
7 A I would tell you that I've read them all
8 completely several times.
9 Q Would you consider yourself an expert on
10 the policies and procedures contained in the official
11 manual, as well as the book of amendments?
12 A I'm not an expert.
13 Q Okay. All right. To your knowledge -- is
14 it okay if I call that other book the book of
15 amendments?
16 A You can call it whatever you want to call
17 it.
18 Q Well, no, I want to make sure you and I are
19 understanding each other. What's the official name of
20 the book, then?
21 A As I remember, it's called the Book of
22 Certified Amendments.
23 Q Okay. All right. To your knowledge, does
24 the Book of Certified Amendments contain any
25 directions or policies or procedures relative to a

Page 61

1 local church transferring jurisdictions?
2 A I'm sure it does.
3 Q Okay. To your knowledge, does it?
4 A I'm sure it does, to my knowledge.
5 Q Okay. All right. To your knowledge, does
6 the official manual also contain the directions or
7 policies or procedures relative to a local church
8 requesting transfer from a jurisdiction?
9 A It does not specifically address the
10 process of transferring. That's covered by the Book
11 of Certified Amendments.
12 Q Okay. And are you familiar with that
13 procedure?
14 A I am.
15 Q Okay. Please tell us what that is.
16 A Tell me what you want to know.
17 Q I want to know --
18 A Excuse me. Do you have a specific question
19 that you want to know?
20 Q Well, I want to know -- I'll ask it as a
21 question, as you apparently prefer. What are the
22 specific steps that a local church must go through in
23 order to transfer from one jurisdiction to another?
24 A The first thing that a local church must do
25 is give notice, and that's what I call it, because

Page 62

1 they're required to send a letter, or, in this
2 electronic age, they can actually go into the ARC
3 system, and request a transfer from one jurisdiction
4 to another, either via letter or via the ARC system.
5 They have to specify the jurisdiction that they're --
6 that they wish to transfer from, to the jurisdiction
7 that they plan to transfer to.

8 They also have to give a date and time when
9 they expect to have the required meeting of the local
10 church to decide, via vote of a majority -- I think
11 it's two thirds of the membership is required to be
12 present and voting. And that form has to be
13 submitted, either via letter or in the ARC system, to
14 the general secretary's office, copied to the bishop
15 whose jurisdiction they wish to transfer from, and to
16 the jurisdiction -- Jurisdictional Bishop where they
17 want to transfer to.

18 And then from there, the national church or
19 the general secretary's office will review those
20 forms, and make sure that -- and I can't tell you what
21 they do. I can only tell you what I do, because I
22 don't have any say in that issue, other than to be
23 present when a vote takes place in regard to that
24 matter. But it goes to the general secretary's
25 office.

Page 63

1 **Q And then what happens from there?**

2 A It's either approved or disapproved in
3 terms of the process. And whether or not the transfer
4 takes place, that's also a matter that's beyond my
5 control. So you would have to understand that when
6 the vote takes place, that vote in terms -- or the
7 results of that vote are sent to the general
8 secretary's office again.

9 But the entire process can only begin and
10 be initiated by the pastor of that local church. The
11 pastor of that local church is the only one who can
12 submit the request for transfer. And that was a step
13 that I left out. That's the beginning of it. The
14 pastor of the local church has to submit the request
15 for transfer.

16 **Q Okay. And is -- the pastor's submission of**
17 **that request, is that something that happens before**
18 **the notice that you referenced? You said give notice**
19 **to the general secretary's office.**

20 A That has to be initiated by the pastor.
21 Only the pastor of the local church can initiate the
22 process by completing the forms or sending the letter
23 or going into the ARC system to initiate the process.

24 **Q Is that the same step that you referenced**
25 **earlier about giving the notice to the general**

Page 64

1 **secretary's office or --**

2 A That's correct. Can only be done by the
3 pastor of that local church.

4 **Q All right. Now, I believe you said step**
5 **two was the general secretary's office would receive**
6 **the results of the local meeting where it's put to a**
7 **vote; is that correct?**

8 A I don't think I said that it's step two.
9 That may be the way that you wrote it, but it starts
10 with the initial request, either via letter or through
11 the ARC system, by the local pastor, submitted to the
12 general secretary's office, copied to the
13 jurisdiction -- Jurisdictional Bishop where the church
14 wants to transfer to, and to the Jurisdictional Bishop
15 from which the church wants to transfer from. That
16 goes to the general secretary. It is also sent --
17 again, copied to each bishop that may be involved.

18 **Q Okay.**

19 A Step --

20 **Q I'm sorry.**

21 A The next step involves the actual voting.
22 There must be a date identified in the form or in the
23 letter or through the ARC system, of the proposed date
24 that the vote will take place. And each of the two
25 bishops is given an invitation to attend that vote.

Page 65

1 The vote results -- that is, assuming that there is a
2 vote, the voting results are submitted to the general
3 secretary's office. Okay. And from there -- or
4 whatever happens to that is the general secretary's
5 responsibility, not the Jurisdictional Bishop.

6 **Q Okay. Is it mandatory for the bishop of**
7 **the present jurisdiction, as well as the bishop of the**
8 **potentially receiving jurisdiction, to be provided an**
9 **invitation to attend the meeting and vote?**

10 A All of that's a part of the form or the
11 letter, and it is required.

12 **Q Okay. All right.**

13 A When you use the word "mandatory," it's
14 required.

15 **Q Okay. The approval or disapproval of such**
16 **a request, who does that?**

17 A You would have to ask the general
18 secretary's office. I have no control, neither I nor
19 the receiving bishop determine whether or not the --
20 first of all, the procedure is accurate, or the vote
21 was accurate, or if there's going to be a transfer.
22 But, again, only the local pastor can initiate that
23 request. And so that's not my call.

24 **Q I understand it's not your call. But my**
25 **question is, who either approves or disapproves the**

Page 66

1 request?

2 A That's -- I've answered that question.

3 Don't know.

4 Q Your testimony is you don't know who

5 approves or disapproves these requests?

6 A I don't know who approves or disapproves

7 the process for transferring. I can tell you what the

8 process is, and the requirements of the process. In

9 terms of what happens when it gets to the general

10 secretary's office, that's not something I can tell

11 you about, because I don't know.

12 Q How is the approval or disapproval of such

13 a request communicated to the requesting church?

14 A That comes from the general secretary's

15 office.

16 Q Is there some sort of --

17 A The requesting church will receive a letter

18 stating to that person this is what happened, and

19 et cetera, et cetera, so will each bishop involved.

20 And we'll get a letter from the general secretary's

21 office acknowledging the approval of the transfer.

22 Q Okay. Or presumably the disapproval?

23 A Don't have to do a disapproval, because if

24 it's not approved, it's automatically disapproved.

25 Q Is that part of the official manual?

Page 67

1 A That's not in the official manual.

2 Q Is it -- is it in the Book of Certified

3 Amendments?

4 A The Book of Certified Amendments identifies

5 the process and the procedure. It doesn't tell me

6 what's going to happen in terms of what the general

7 secretary's office does. At least I haven't read

8 that.

9 Q Okay. But you stated that if it's not

10 approved, there doesn't need to be a disapproval. Is

11 that stated anywhere in the Book of Certified

12 Amendments?

13 A It is not.

14 Q Okay.

15 A Not that I've read.

16 Q Okay. Roughly how many years have you been

17 a bishop with COGIC?

18 A Since 2010. I was consecrated November

19 2010. And this is 2023, so I'm looking at, in

20 November, 13 years.

21 Q Okay. In those 13 years, are you aware of

22 any local church's request for transfer being denied

23 or disapproved?

24 A I'm aware of a local church's attempt to

25 transfer not being approved. I am.

Page 68

1 Q Okay. The attempt that you are aware of

2 that was not approved, was that in your jurisdiction?

3 A It was.

4 Q Okay. And was that the defendant's church,

5 as we sit here today?

6 A Well, it's not -- it's the church he's --

7 in terms of being his church, it's the church that

8 he's operating in. But I am the pastor of that

9 church, and I did not initiate the transfer request.

10 And therefore, the transfer request could not be

11 approved. And I believe he received, or at least I

12 received something to that effect, making him aware

13 and making the church aware that unless he is the

14 pastor of the church, he could not initiate a transfer

15 request. I have not initiated a transfer request, and

16 I'm the pastor of record of the Westside Church of God

17 in Christ on 51 Marshall Lane. And Westside Ministry,

18 Inc. Church of God in Christ at 51 Marshall Lane, and

19 the other one, 2313 North G Street. So I would have

20 to initiate any request for transfer.

21 That's not the only transfer that I know

22 was not approved, and I know there has been at least

23 one other that I was familiar with that was not

24 approved.

25 Q Okay. Was that also under your

Page 69

1 jurisdiction?

2 A It was also in this jurisdiction, yes.

3 Q Okay. Got it. Okay. The information

4 relative to, you know, records kept of requests to

5 transfer jurisdictions, would that -- I withdraw that.

6 That was asked and answered. So I withdraw that.

7 All right. Is it your testimony that --

8 that -- well, let me back up.

9 Is there anything else that a church needs

10 to do in order to request a transfer, other than what

11 we already talked about?

12 A Not to my knowledge.

13 Q Okay.

14 A Let me take that back because -- and that's

15 a part of the process. It's in the process, the

16 church must also identify its membership and attach a

17 membership roster to that request. And sometimes that

18 roster may be left out, but that's also a part of that

19 process.

20 Q Okay.

21 A And they must certify in writing -- once

22 that vote takes place, as I told you, the results have

23 to be sent to the general secretary's office. They

24 have to certify the attendance and the process, and

25 the vote outcome. All of that's a part of that

Page 70

1 process.

2 **Q What's the -- how is that certification**

3 **handled? In other words, what makes that a**

4 **certification? Is there like a notary or something**

5 **that was present that --**

6 A No, I don't -- when I say certify, I don't

7 mean legal certification, I mean they have to verify

8 in writing to the general secretary's office the

9 details about what, when, where, and who and why, and

10 what happened, the results, in writing.

11 **Q Understood. I'm going to ask you some**

12 **questions now regarding the church governance. When I**

13 **use the term "COGIC," can we agree that I'm**

14 **referencing the Church of God in Christ, with its**

15 **headquarters in Memphis, Tennessee?**

16 A Yes.

17 **Q Okay. You're familiar with the different**

18 **either individuals or groups that govern the actual**

19 **church of COGIC, right?**

20 A Generally, yes.

21 **Q Okay. Is the General Assembly, is that**

22 **just a term referencing a meeting, or is the General**

23 **Assembly an actual body of individuals that make up**

24 **the General Assembly?**

25 A The General Assembly is the body. In fact,

Page 71

1 it is a body of COGIC, you can say, the Church of God

2 in Christ, and it's identified in our constitution as

3 the law making and law interpreting body of the Church

4 of God in Christ. And it consists of both officers

5 who are members of that General Assembly, and

6 delegates who qualify periodically. Because the

7 General Assembly only meets officially two times a

8 year in its role. However, there are officers and

9 individuals who qualify as members of that General

10 Assembly, such as the chairman of the General

11 Assembly, the vice chairman, the secretary. Those are

12 members voted and elected to positions. Other

13 individuals may qualify as delegates to a specific

14 assembly, either in November or in April.

15 **Q Okay. Are delegates the individuals that**

16 **are asked to attend the meetings?**

17 A Nobody's asked to attend the meetings.

18 **Q Okay. Then what is a delegate to the**

19 **General Assembly?**

20 A A delegate to the General Assembly can be

21 qualified to attend the General Assembly if he meets

22 certain conditions.

23 For example, I'm a Jurisdictional Bishop.

24 As a Jurisdictional Bishop, I am qualified to attend

25 the session of the General Assembly, to represent the

Page 72

1 jurisdiction where I serve. I can qualify through the

2 election process and the certification that an

3 individual, whether he's a pastor or a district

4 missionary, have met the criteria, and I can certify

5 it through a form that I submit for each General

6 Assembly, that this individual has qualified to attend

7 and participate as a delegate. And I want to be very

8 clear, there's a big difference between qualifying as

9 a delegate and being a member of the General Assembly.

10 **Q Thank you. Tell me what that difference**

11 **is.**

12 A The difference is -- and I think I said it

13 to you earlier. A person who is a member of the

14 General Assembly is one such as the chairman, the

15 secretary, the vice chairman, the various officers

16 that preside over standing committees. The others of

17 us qualify as delegates, and I explained to you that I

18 can qualify as a delegate as a Jurisdictional Bishop.

19 And then I am responsible for making sure that anyone

20 else who attends the jurisdiction -- the General

21 Assembly, out of my jurisdiction, meets a certain

22 criteria to be there as a delegate. Only delegates

23 are allowed to vote. Any member of a jurisdiction or

24 a local church can attend the General Assembly and be

25 present, but when it comes down to voting, only

Page 73

1 delegates are allowed to vote on certain issues of the

2 General Assembly. So there's a difference.

3 **Q Are delegates allowed to vote on all issues**

4 **that are before the General Assembly?**

5 A No, every issue does not require a vote by

6 the delegates.

7 **Q Okay. So are there other issues that**

8 **require a vote of the officers, but not the delegates?**

9 A I'm not sure if I understand your question.

10 **Q Yeah. The way I understood your last**

11 **answer was that not every issue requires a vote of the**

12 **delegates. And that's accurate, correct?**

13 A That is correct.

14 **Q Okay. Are there other issues that don't**

15 **require a vote of the delegates but do require a vote**

16 **of the officers?**

17 A The officers of the General Assembly would

18 not be -- I guess it depends on what you're

19 referencing. If it's an issue that is a nonvoting

20 issue, the officer is going to, of course, move those

21 items forward without a vote from the General

22 Assembly. When you have a vote on an issue from the

23 General -- that involves the General Assembly, each

24 delegate is given an opportunity to vote yes or no, or

25 they can do it by voice vote. We've been introduced

Page 74

1 to electronic voting most recently because of the
2 pandemic, where a lot of our delegates could not get
3 there in person, and so we've had to use a variety of
4 instruments to register our vote either yes or no.
5 But for issues that require a vote, every
6 delegate -- and by the way, an officer has one vote
7 just like every other delegate. So it does not matter
8 that he's an officer. If it's an issue that's
9 requiring approval of the General Assembly, it must be
10 voted on by the qualified delegates. And everybody in
11 attendance has one vote.
12 **Q Okay. Is there such a thing as a**
13 **nonqualified delegate?**
14 A No, not to my knowledge.
15 **Q Okay.**
16 A Again, you're allowed to attend the General
17 Assembly and not be a delegate, but usually you're
18 placed up in the balcony somewhere. You can't vote on
19 any issue. There's a very clear distinction when we
20 allow -- and when I say "we," I'm talking about COGIC,
21 when we allow nonqualifying delegates to attend. So
22 that when there are issues that are being voted on, we
23 can clearly identify who can and who cannot vote.
24 For example, we had to use electronic
25 devices to vote in our last assembly. Only delegates,

Page 75

1 qualified delegates were issued electronic devices to
2 vote with.
3 **Q Understood. When was the last assembly?**
4 A The General Assembly meets in November and
5 April of each year, the last assembly was April --
6 **Q Okay.**
7 A -- of 2023.
8 **Q Did you attend that assembly?**
9 A Absolutely.
10 **Q And were you -- did you attend as a**
11 **delegate?**
12 A Absolutely.
13 **Q Okay. And did you vote on anything while**
14 **you were there?**
15 A Absolutely.
16 **Q Okay. Were -- was the existence of this**
17 **lawsuit discussed at all at the General Assembly?**
18 A I can't answer that question about whether
19 it was discussed at all. It was not discussed at any
20 time when I was in attendance during the General
21 Assembly.
22 **Q Were there any votes taken, to your**
23 **knowledge, that would relate in any way to this -- the**
24 **issues in this lawsuit?**
25 A Not while I was there.

Page 76

1 **Q Okay. All right. Did you attend the**
2 **entire meeting?**
3 A I attended the entire meeting. I didn't go
4 to every session of the General Assembly. The General
5 Assembly, much like this deposition, last all day.
6 All day, half the night. We take breaks for lunch,
7 dinner, and various other resources, and I'm sure I
8 missed -- I know I missed, I don't have to tell you
9 any doubt about that, because I didn't sit through
10 every session of the General Assembly. I was
11 allowed -- you're allowed to leave and return.
12 **Q Were there any votes taken of the delegates**
13 **in this last General Assembly, that, to your**
14 **knowledge, you missed?**
15 A I'm sure there had to be, because I didn't
16 attend every session --
17 **Q Uh-huh.**
18 A -- every hour of every session.
19 **Q Okay.**
20 A So I'm sure I missed something.
21 **Q Okay. And I'm certainly not going to ask**
22 **you every topic that was discussed or voted on in the**
23 **April 2023 General Assembly. So my question is, are**
24 **there minutes available for the April 2023 General**
25 **Assembly?**

Page 77

1 A I'm sure there is.
2 **Q And whom -- whom or what department would**
3 **have possession of those?**
4 A That's a general secretary's job.
5 **Q Got it. Same as before?**
6 A Same as before.
7 **Q Okay. And if we were to seek any kind of**
8 **records from COGIC, would the general secretary's**
9 **office always be the one we go to?**
10 A That's where I would go. I can't tell you
11 where you should go, but I can tell you that that's
12 where I would go because the general secretary is the
13 custodian of the records for the Church of God in
14 Christ.
15 **Q All records, as far as you know?**
16 A All national records. All records
17 involving the national church.
18 THE VIDEOGRAPHER: A video request to go
19 off the record just to change media?
20 MR. JOHNSON: Sure.
21 THE VIDEOGRAPHER: Are we good?
22 MR. JOHNSON: Yeah.
23 THE VIDEOGRAPHER: Okay. The time is
24 10:37, and we're now off the record.
25 (Recess from 10:37 a.m. until 10:50 a.m.)

Page 78

1 THE VIDEOGRAPHER: The time is 10:50, and
2 we're now back on the record.
3 MR. JOHNSON: Can you please just read back
4 my last question so I can remember where we --
5 (Thereupon, the aforementioned question was
6 read by the reporter as recorded above.)
7 MR. JOHNSON: Understood. Thank you.
8 BY MR. JOHNSON:
9 Q The General Assembly, is it -- are there
10 individuals that are referred to as members of the
11 General Assembly?
12 A Normally they are referred to as officers.
13 I just -- I think I answered that question that I
14 consider the chairman, the vice chairman, the
15 secretary, the parliamentarian, their committee
16 chairpersons who are in charge of standing committees,
17 those are individuals that I would call members.
18 Q Understood. All right. So we use the
19 terms officers or members interchangeably?
20 A I would not, because an officer is
21 different from the person who may be a chairman of a
22 standing committee or who may be a member of a
23 standing committee. It doesn't have to be an officer
24 in a standing committee, may be a member in a standing
25 committee.

Page 79

1 Q Thank you.
2 Back in April of 2022, there was a General
3 Assembly meeting that was held, correct?
4 A That's correct.
5 Q Okay. And did you attend that meeting?
6 A I attended most sessions of that meeting.
7 I did not attend every session of that meeting.
8 Q All right. Back then, who was the -- who
9 were the officers of the General Assembly in April of
10 '22?
11 A I can't name all of the officers of the
12 General Assembly.
13 Q Who was the chairman of the General
14 Assembly?
15 A Bishop Lemuel Thuston.
16 Q Who was the vice chairman?
17 A I can't name the vice chairman at this
18 time. I'm sure if I -- because we elected a new vice
19 chairman, and I don't think that vice chairman was in
20 place. It was the previous vice chairman, whose
21 mind -- whose name slips my remembrance at this time.
22 Q Who is the secretary of the General
23 Assembly?
24 A The secretary of the General Assembly is
25 always the secretary of the General Church, which

Page 80

1 would be Bishop Lyles.
2 Q Okay. Do you know who the parliamentarian
3 was?
4 A No.
5 Q Okay. Who's responsible for creating the
6 minutes of the General Assembly meetings?
7 A I don't know who's responsible for creating
8 the minutes. I think the general secretary is
9 responsible for recording the minutes. And how that's
10 done, I can't tell you.
11 Q Do the delegates have any involvement in
12 that whatsoever?
13 A In creating the minutes? No.
14 Q Okay. Or do the delegates have any
15 involvement in recording the minutes?
16 A No, they have -- they approve the minutes,
17 once those minutes are brought and presented to the
18 General Assembly. The General Assembly approved those
19 minutes, and those minutes become the official minutes
20 of the meeting. And that usually happens at the
21 subsequent meeting of the General Assembly.
22 Q In this particular case, if we're talking
23 about the April 2022 General Assembly, the subsequent
24 meeting was in November of 2022; is that correct?
25 A That is correct.

Page 81

1 Q And did you also attend that?
2 A I did.
3 Q And again, did you attend all of it?
4 A I did not attend every session. Again,
5 it's -- it's hard to attend every session of the
6 General Assembly.
7 Q Understood.
8 A All day long, start in the early morning,
9 and may take a break for lunch, come back in the early
10 afternoon, stay all evening, adjourn sometime that
11 night. And delegates are allowed to go and come.
12 But, of course, if you've got a device, you've got to
13 submit that device when you check out, pick it up when
14 you come back in. So they have a tally of who's
15 present.
16 Q Do you recall at the November '22 General
17 Assembly, if there was a vote to confirm or approve of
18 the minutes of the April '22 General Assembly?
19 A Yes.
20 Q All right. Did you take part in that vote?
21 A Yes.
22 Q Okay. Did you read the minutes before you
23 voted?
24 A No.
25 Q Why would you vote to approve or disapprove

Page 82

1 of the minutes without reading them?

2 A Normally the way the process works is that
3 the minutes are sent out in advance of the meeting.
4 And when the issue comes up on the agenda, it's
5 brought up for approval, and those who may have
6 objections to something that's in there or not in
7 there, or the way something is written, those
8 individuals would go up and state their objections.
9 And the presumption is that those who are concerned
10 about the minutes read those minutes. If there are no
11 objections, then -- or if you have objections, you
12 listen to objections.

13 And if you -- and this is the way I
14 operate. I was there at the meeting, for the most
15 part. I know what happened and transpired. I did not
16 read those minutes in advance, and I listened to see
17 what those objections were. And if I agreed with any
18 of those objections, then my vote would have been
19 probably different, as opposed to if I agreed (sic)
20 with those objections.

21 So no, I didn't read the minutes in the
22 advance, but I did vote when the time came to vote.

23 Q And did you vote for approval?

24 A I did.

25 Q At the -- at the November 23rd -- I'm

Page 83

1 sorry, not November 23rd. At the November '23 General
2 Assembly, were there any objections to the minutes as
3 presented of the April '22 -- no, I'm sorry. I'm
4 going to back up. I misspoke.

5 At the November '22 General Assembly, prior
6 to the vote and approval or confirmation of those
7 minutes, were there any objections?

8 A I can't say specifically that there were,
9 but based on what I have experienced in the past, I'm
10 sure there were some objections. I can't tell you
11 what those objections were, because there are always
12 objections --

13 Q Okay.

14 A -- to almost everything that comes up on
15 the floor.

16 Q A minute ago, I thought you testified that
17 if there were any objections before you voted, that
18 would you listen to those --

19 A I would have listened, yes.

20 Q Okay. All right. In this particular case,
21 are you -- ask you telling me that in November of '23
22 (sic) -- I'm not arguing with you, I'm just trying to
23 clarify -- that you don't recall if there were any
24 objections to the April '22 minutes before you voted?

25 A I don't recall that there were any specific

Page 84

1 objections, but I said I'm sure there were objections.
2 But I'm also sure there were none that peeked my
3 interest.

4 Q I'm going to present to you what I'm going
5 to label as Exhibit A, just ask you to take a look at
6 it. Whoop, I gave you mine, too. Can I have mine
7 back?

8 Did you give me both back?

9 A I'm sorry.
10 (The document was marked for identification
11 as Defendants' Exhibit A.)
12 BY MR. JOHNSON:

13 Q Just take a look at it, and I've just got a
14 question for you about it.

15 A Okay.

16 Q All right. Are you familiar -- you can
17 hang on to it. Are you familiar with that document?

18 A I am familiar with this document.

19 Q All right. What is it?

20 A It is a document giving notice that the
21 Church of God in Christ General Assembly minutes from
22 April 5 through 6, 2022, are being filed with the
23 Court in this case.

24 Q All right. And you or your attorney on
25 your behalf filed a copy of the minutes in this case;

Page 85

1 is that correct?

2 A The attorney filed a copy of the minutes in
3 this case.

4 Q All right. Did you read the minutes before
5 they were filed?

6 A I did.

7 Q Okay. Was there anything notable about
8 them to you when you read them?

9 A Not at all.

10 Q Okay. Are you aware that the minutes that
11 were filed with the Court contained no reference to
12 this matter, yourself, or Pastor Watts?

13 A I am.

14 Q Okay. Can you explain to us why that would
15 be true?

16 A I cannot.

17 Q Were you surprised when you found out that
18 the minutes didn't have any reference to yourself or
19 Pastor Watts or this case?

20 A I was not surprised.

21 Q Why were you not surprised?

22 A During the sessions that I attended, and
23 all previous General Assembly sessions, no matter what
24 transpires in that meeting, the delegates are asked to
25 vote and give their approval on most items. And I was

Page 86

1 there, and I never remember a vote to approve whatever
2 happened on that day with Pastor Watts and myself.
3 **Q Okay.**
4 A So I was not surprised not to see it in the
5 minutes.
6 **Q Okay. So is it your testimony that the**
7 **only matters that are recorded in the minutes of a**
8 **General Assembly meeting are those matters in which**
9 **there's a vote taken?**
10 A That's not my testimony.
11 **Q Okay. Other than the assumption that there**
12 **was no vote taken regarding this matter or any matters**
13 **involving yourself or Pastor Watts, are you aware of**
14 **any other reason that the subject matter of this case,**
15 **yourself, or Pastor Watts was not included in the**
16 **minutes?**
17 A I can only tell you what happened or has
18 happened in the past as I've attended General
19 Assemblies, that whatever happened may have been a
20 part of something that was not -- I guess what I would
21 call, that was not expected. It was something that
22 was not maybe agenda, because I looked at the agenda
23 as well, and I had no knowledge that I would be
24 involved in any way whatsoever, in terms of what
25 happened with me and Pastor Watts. I did know that

Page 87

1 there were some things being considered by the
2 committee that made a presentation. And normally
3 committee reports are approved or disapproved by a
4 vote of the General Assembly. So I was not surprised
5 when I didn't see any references there because I
6 wasn't even expected to be there. I was surprised
7 when I was called, when my name was called during the
8 General Assembly itself.
9 **Q Who didn't expect you to be there?**
10 A I was not ex -- I didn't expect to be
11 called up to the stage for any reason. I had no
12 notice. So that's what I'm referring to. Some things
13 happened contemporaneously, I guess, and they may not
14 always get included. I don't know why. Nothing was
15 mentioned in the minutes. But I do know the time I
16 was there, the committee's report was never approved
17 by the General Assembly -- by a vote of the General
18 Assembly.
19 **Q Okay. What was the name of the committee**
20 **in this particular instance?**
21 A The committee -- the exact name I cannot
22 call -- recall, but it was something about the
23 mediation and it was some type of committee. And it
24 was, by the way, a newly formed committee that
25 happened as a result of the request that was being

Page 88

1 made, as far as I was told. I was not involved in the
2 formation of that committee. But as I understand it,
3 that was a new committee.
4 **Q Was that the committee that was led by**
5 **Dr. Jenkins?**
6 A As far as I know, he was the chairman of
7 that committee.
8 **Q Do you know the names of any other**
9 **individuals that were on the committee?**
10 A I cannot recall any of the names.
11 **Q Was Dr. Jenkins at the General Assembly**
12 **meeting in April of '22, to your knowledge?**
13 A Yes, he was.
14 **Q Did you speak to him at that time?**
15 A I did not speak to him during the General
16 Assembly, no.
17 **Q Does every -- and I'm sorry, did you say**
18 **that the committee, Dr. Jenkins' committee produced a**
19 **report?**
20 A As I remember, Dr. Jenkins and his
21 committee were called up to make a report, and their
22 report was extensive. They had quite a few items in
23 their report that had nothing to do with me. So they
24 made a report on several items that day.
25 **Q Was that -- was that report read out loud?**

Page 89

1 A As I remember it, they read their report --
2 portions of the report. I think I remember hearing
3 him saying something like he was not going to read the
4 entire report, whether it was a specific report that
5 you're talking about. But I think they gave a general
6 report to the delegates about what the committee had
7 done. Or what the committee was working on and what
8 the committee was recommending.
9 **Q You were present at the meeting when**
10 **Dr. Jenkins read the report, or at least portions of**
11 **it?**
12 A I was.
13 **Q Okay. And I think you stated earlier, to**
14 **your knowledge, there was no vote taken on the report,**
15 **right?**
16 A To my knowledge. I was there the day and
17 night, and if there was a vote taken, I missed it.
18 Because I didn't vote on it.
19 **Q Has -- has anybody ever told you that there**
20 **was a vote taken on the report?**
21 A Not that I recall. And I've asked
22 specifically about whether or not the report --
23 because you included it as part of your record,
24 claiming that it was something that had been approved
25 by the General Assembly, and I know in order for

Page 90

1 something to come out of the General Assembly as
2 having been approved, there has to be a vote on that.
3 And I don't recall there ever being a vote on it.
4 **Q Okay. All right. Does the General**
5 **Assembly vote on all committee reports?**
6 A The General Assembly may not vote on all
7 committee reports, because sometimes when a committee
8 makes a report, it may table that report. The
9 chairman may say he's only receiving the report as --
10 for whatever purpose, and there's not always a vote on
11 every report. But once the report becomes an official
12 report of the General Assembly, it means that the
13 General Assembly voted and approved that report.
14 **Q To your knowledge, was Dr. Jenkins' report**
15 **an official report?**
16 A To my knowledge, his report was not an
17 official report because it was not approved, to my
18 knowledge, by the General Assembly. I saw his report
19 and still see his report today, and I haven't seen
20 anything to the contrary as a recommendation coming
21 out of his committee, his newly formed committee, to
22 deal with the specific request -- or several specific
23 requests. Because the Watts' request was not the only
24 request that his committee considered.
25 **Q What are you referring to as the Watts'**

Page 91

1 **report?**
2 A The portion of his report that you put in
3 the files in this case, saying that there was a
4 mediation between Watts and Green in reference to this
5 lawsuit. That's what I'm referencing when I talk
6 about the Watts' report.
7 **Q Okay. The same report as Dr. Jenkins'**
8 **report?**
9 A Dr. Jenkins' report, again, was a report
10 from a committee that was a part of several items in
11 his report. So we have to talk about reports of his
12 committee, because there was more than one item in his
13 committee's report.
14 **Q Okay. Was there more than one report or**
15 **more than one item in the single report?**
16 A The committee gave several reports. Now,
17 whether you want to call them separate reports, but
18 they were called up to give their report. And during
19 that process, they read out several reports. And I'll
20 call them reports. So, yes, there was more than one
21 report made by his committee.
22 **Q Okay. So, to your knowledge, the report**
23 **that has been filed in the case, that you mentioned,**
24 **is that the complete report, or there's other portions**
25 **of it?**

Page 92

1 A No, that's not the complete report, because
2 it does not include every report or everything that
3 Dr. Jenkins' committee gave out during that General
4 Assembly.
5 **Q Do you --**
6 A There were other items in there.
7 **Q Do you or your attorney have copies of the**
8 **other portions of that committee's report?**
9 A I don't know if Mr. Gant has a copy of it,
10 but I don't have copies of the other -- the complete
11 report. I don't have copies of the complete report.
12 **Q If Mr. Gant doesn't have those copies, to**
13 **your knowledge, would copies of those portions also be**
14 **in the possession of the general secretary?**
15 A He's the custodian of the records.
16 **Q Okay. Okay. At any time -- oh, I'm sorry.**
17 **You read the minutes that were filed before they were**
18 **filed, correct?**
19 A The minutes that were filed in this case,
20 yes.
21 **Q Yes. Okay. Got it. All right. All**
22 **right.**
23 A And by the way, you-all are -- I'm not
24 saying you specifically, have accused me of tampering
25 with the minutes in this case. I don't have the

Page 93

1 ability to do that. The minutes that have been filed
2 in this case are the minutes that came out from the
3 general secretary's office, and they're available to
4 any qualified delegate. You can go online right
5 now -- in fact, if I had a computer, I can go online
6 right now and pull up the minutes of most of our
7 meetings in the General Assembly of the Church of God
8 in Christ dating back several years.
9 **Q To your knowledge, who does have input into**
10 **what is included in the minutes?**
11 A I don't know, other than to tell you that
12 the general secretary is the custodian of the records,
13 and that's his responsibility.
14 **Q Okay.**
15 A The minutes of meetings would be his
16 responsibility.
17 **Q Okay. Are you aware if any individuals**
18 **other than the general secretary have any input on**
19 **what's included in the minutes?**
20 A Not that I'm aware.
21 **Q Okay. All right. The -- does the General**
22 **Assembly make rulings?**
23 A Explain what you mean by rulings.
24 **Q Decisions.**
25 A The General Assembly is the highest law

Page 94

1 making body, policy making body, and there are times
2 when it does make judicial decisions relative to
3 matters that may involve the departments of the
4 church. For example, if there's a dispute with the --
5 within the board of bishops or within the judiciary
6 board, that issue would come before the General
7 Assembly. The General Assembly's ruling is the only
8 ruling in the Church of God in Christ that is final.
9 If they make a decision and issue a ruling, and it's
10 approved by the delegates, then that decision is
11 final.

12 **Q And would that decision, once it's final,**
13 **be binding on all of COGIC?**

14 A Every member in the Church of God in
15 Christ -- of course, when you say binding, I'm a
16 member of the Church of God in Christ. Their decision
17 would be binding on me as a member of the church. But
18 if I choose not to abide by that, I don't have to be a
19 member of the Church of God in Christ. Because they
20 can't tell me what to do as an individual.

21 **Q When the General Assembly makes a**
22 **decision -- I mean, is that -- I want to make sure we**
23 **don't get bogged down in semantics. I said "ruling"**
24 **before, but what -- is it okay if I use the word**
25 **"decision"?**

Page 95

1 A Decision is a better word, depending on
2 what I just said. Because I'm talking about if a case
3 comes before the General Assembly, and the General
4 Assembly litigates that case, whether it's between --
5 and that's usually something, as I said, that might be
6 a case involving a dispute between departments or
7 between the judiciary board or the board of bishops --
8 the judiciary board normally handles most judicial
9 appeals that come up from the lower departments. And
10 once they make their decision, it's final, unless it
11 involves one of those issues that only the General
12 Assembly can resolve.

13 **Q Okay. Once the General Assembly makes a**
14 **decision, how is that memorialized?**

15 A By -- if it's -- it's memorialized in the
16 report and in the minutes of that -- of the General
17 Assembly, and they would issue a ruling. If it's a
18 case involving, let's say Green v. Watts, and we -- of
19 course, that would not go to the General Assembly
20 normally because that's not a dispute between
21 departments within the church. Anybody can appeal
22 their case to the judiciary board, but anybody can't
23 appeal it to the General Assembly.

24 But once they issue a ruling, it would come
25 out pretty much like you style your case. It would be

Page 96

1 styled as Green v. Watts. They would list the issues,
2 and then they would give the final decision from the
3 General Assembly.

4 And first of all, that would go through the
5 legal process. There's a committee within the General
6 Assembly that would handle most legal disputes when
7 they come up between parties like that. The General
8 Assembly would then do the final vote on whether or
9 not to approve or disapprove that -- that decision.

10 Primarily, the General Assembly is the
11 policy-making body, but there are some issues that can
12 be appealed to the General Assembly if you're not
13 satisfied with the rulings in the lower courts. We
14 call our tribunals lower courts.

15 For example, in the jurisdiction, anybody
16 who's unhappy with the decision that I make in the
17 jurisdiction, they can appeal to the general council
18 of pastors and elders. If I'm not -- if they're not
19 happy with the decision at the general council of
20 pastors and elders, then they can appeal to the
21 judiciary board.

22 Normally, that's the end of the appeal
23 process, because the judiciary board, in the Church of
24 God in Christ, is like the Supreme Court of America.
25 However, there are some issues that can be appealed

Page 97

1 from the judiciary board through the General Assembly.
2 That's what I'm trying to explain to you. But
3 generally those issues, when they are appealed to the
4 General Assembly, there is a ruling issue announcing
5 that decision.

6 **Q And is my understanding correct that once**
7 **the General Assembly makes a decision, that can be**
8 **appealed then to the judiciary board?**

9 A No, that's not what I said.

10 **Q I'm sorry, what did you say?**

11 A When you're talking about a decision --

12 **Q Correct.**

13 A -- can you clarify what you mean by a
14 decision? Because I think we're talking about apples
15 and oranges here.

16 **Q Okay.**

17 A If the General Assembly votes on an item
18 that comes up during the General Assembly, and that
19 item is approved, then that item is approved.

20 **Q Is there any mechanism to appeal that?**

21 A From the General Assembly?

22 **Q Yes.**

23 A There is no mechanism to appeal the rule.
24 If the General Assembly says this is the rule that
25 we're going to follow, that becomes the rule.

Page 98

1 **Q** **Okay.**

2 A You can come back to another General

3 Assembly and contest or say there was a mistake made,

4 we can do such and such. That's -- but when we're

5 talking about the function of the General Assembly,

6 the General Assembly makes policies. When it comes

7 down to interpreting and adjudicating those policies,

8 that comes through the judiciary board starting at the

9 lower tribunals. The jurisdiction, the general

10 council of the department of women or the board of

11 bishops, up through the judiciary board.

12 **Q** **Okay. And -- but the General Assembly**

13 **would be at the top, right? They're the final say?**

14 A The General Assembly, and in some cases the

15 general -- the judiciary board is the final say. And

16 there are some issues that are appealable to the

17 General Assembly.

18 **Q** **But a General Assembly decision is not**

19 **appealable?**

20 A The General Assembly decision is final.

21 **Q** **Got it. Okay.**

22 (The document was marked for identification

23 as Defendants' Exhibit B.)

24 BY MR. JOHNSON:

25 **Q** **I'm going to hand you what I've labeled as**

Page 99

1 **Exhibit B. Can you take a minute and review that, and**

2 **tell us if you've seen that before.**

3 A I have seen it before.

4 **Q** **Okay. And what is it?**

5 MR. GANT: I'm going to object to the

6 document. It appears that my counsel -- or

7 counsel is attempting to ask questions of my

8 client in the nature of a corporate witness, to

9 talk about and explain issues of the national

10 church. He's a fact witness, in my opinion, not

11 a corporate witness.

12 In the commission and any determinations of

13 issues regarding the church's final say-so, the

14 church's positions on the such matters regarding

15 this case, his -- the decisions made regarding

16 having an impact on this case would be a

17 corporate witness, and not a fact witness.

18 Additionally, these matters have been

19 already presented to the judge in this case at

20 that hearing we had back in February, and she

21 ruled against the defendants in that matter, but

22 specifically as relates to issues involved in

23 this document called Joint Order of the Presiding

24 Bishop of the General Assembly, specifically was

25 used in that hearing. And it was found to be

Page 100

1 wanting to set forth being sufficient to allow

2 the defendants to win their case.

3 Now, to introduce this document now is

4 contrary to the judge's ruling. More

5 specifically, the judge said that this

6 document -- these issues are not for the Court to

7 decide in Escambia County Circuit Court. The

8 issues for -- to be decided with the Church of

9 God in Christ, these issues, inner workings of

10 the Church of God in Christ. And this court,

11 Escambia County Circuit Court, is not going to

12 get involved in the inner workings of the Church

13 of God in Christ, internal church matters.

14 That's my objection.

15 MR. JOHNSON: Are you instructing him not

16 to answer?

17 MR. GANT: I wanted to put it on the

18 record. What's your question, Mr. Johnson?

19 MR. JOHNSON: Well, I've got a lot of

20 questions.

21 MR. GANT: Go one by one.

22 MR. JOHNSON: Sounds good. Okay. All

23 right.

24 THE WITNESS: He didn't allow me to answer

25 the first question. He asked me if I was

Page 101

1 familiar with the document. Should I answer that

2 question?

3 MR. GANT: What do you mean -- familiar,

4 what does that mean? Familiar, what does that

5 mean?

6 MR. JOHNSON: Has he seen the document

7 before.

8 MR. GANT: Okay, that's different.

9 A Yes, I have seen this document. And as

10 I've said on previous occasion, this document does not

11 represent any final order from the General Assembly of

12 the Church of God in Christ, the General Assembly made

13 in the month of April, and this alleged document, to

14 my knowledge, the Presiding Bishop never signed any

15 such document like this in April of '22, to my

16 knowledge.

17 BY MR. JOHNSON:

18 **Q** **Are you aware that this document was sent**

19 **to me and your counsel by Mr. Saffold, the general**

20 **counsel for COGIC?**

21 A I'm aware of what I just said to you, that

22 the Presiding Bishop could not have signed any

23 document such as this in April of 2022.

24 **Q** **Okay. My question is, are you aware that**

25 **we received this document from John Saffold, general**

Page 102

1 **counsel for COGIC?**
2 A I don't know where you got it from, but I'm
3 just telling you what I'm aware of.
4 MR. GANT: Object. Go ahead, that's fine.
5 A I'm telling you what I'm aware of, because
6 I know that any -- during the General Assembly, this
7 document was never presented during the General
8 Assembly. I can tell you that because I was there.
9 That's what I'm telling you, this document was never
10 presented during the General Assembly, and could not
11 have been approved by the General Assembly of the
12 Church of God in Christ.
13 BY MR. JOHNSON:
14 **Q Do you recognize the signature at the**
15 **bottom of page 3?**
16 MR. GANT: I object to the questioning.
17 Again, Mr. Johnson is attempting to relitigate
18 issues that have come before the Court. The
19 judge firmly indicated in an order that these
20 matters are not within the Court's confines to
21 adjudicate in her -- specifically as a judge in
22 this circuit. Therefore, you're coming with
23 irrelevant documents. That's irrelevant now.
24 It's been inherited and decided upon by the
25 judge. She said no, you were not sufficiently

Page 103

1 prepared to win your motion on those issues
2 because they're outside the Court's purview and
3 jurisdiction. Therefore, to try to use my client
4 to bring it back up, except to have it three or
5 four months earlier, I think is improper.
6 MR. JOHNSON: Okay.
7 MR. GANT: Any more questions along this
8 line about the church's inner workings have been
9 already decided by the judge in this case.
10 Mr. Green, don't answer those questions,
11 please.
12 THE WITNESS: Will not.
13 MR. JOHNSON: Let's make the record clear.
14 MR. GANT: Make the record clear.
15 MR. JOHNSON: Are you instructing him not
16 to answer any questions about this document?
17 MR. GANT: Yes, I am, for reasons stated
18 earlier.
19 MR. JOHNSON: Fair enough. I'm going to
20 attach that as an exhibit.
21 THE STENOGRAPHER: You just did.
22 MR. JOHNSON: Oh. Just leave it right
23 here.
24 BY MR. JOHNSON:
25 **Q What role does the Presiding Bishop play in**

Page 104

1 **church governance?**
2 A In church governance, as you can read in
3 the official manual as well, the Presiding Bishop is
4 the president of the corporation.
5 **Q As the president of the corporation, what**
6 **role does the Presiding Bishop play in church**
7 **governance?**
8 A He's considered to be the chief executive
9 officer of the corporation, and he represents the
10 Church of God in Christ in all matters, as the head of
11 the Church of God in Christ, the executive head of the
12 Church of God in Christ.
13 **Q And that same vein, would you be considered**
14 **the chief executive officer of Northwest Florida**
15 **Jurisdiction?**
16 A I am, by corporation filing and by
17 designation of the Church of God in Christ.
18 **Q Okay. And in that same vein, would a**
19 **pastor of a COGIC local church be considered the chief**
20 **executive officer of that local church?**
21 A Spelled out in the constitution. He is the
22 executive head of that local church, subject to the
23 authority of the Church of God in Christ and the
24 Jurisdictional Bishop in that jurisdiction.
25 **Q Okay. Well, the same would be true of your**

Page 105

1 **role as executive officer of Northwest Florida**
2 **Jurisdiction, it would be subject to the Church of God**
3 **in Christ, correct?**
4 A That is correct.
5 **Q Okay. All right. Does the Presiding**
6 **Bishop, in your opinion, have the power or authority**
7 **to take property from a local church?**
8 MR. GANT: Object to the form --
9 A I didn't understand the question to begin
10 with. If you --
11 BY MR. JOHNSON:
12 **Q Does the Presiding Bishop have the power or**
13 **authority, provided in the official manual or in what**
14 **you referred to as the Book of Certified Amendments,**
15 **to take property from a local church?**
16 MR. GANT: I object to that question.
17 Again, it's talking of the church's inner
18 workings, religious tenements of the church,
19 which this judge has said she did not get
20 involved in those kind of issues. Any evidence
21 elicited to -- to -- elicited to try to gain
22 evidence on church -- inner workings of the
23 church, things that the judge has already said
24 she does not get involved in -- she ruled against
25 you, Mr. Johnson, your motion to dismiss. You

Page 106

1 lost that motion on the same issue of this
2 document you just -- as an exhibit. It's been
3 tried by a judge. You were not successful in
4 your efforts to get that done. We're not going
5 to retry the same case before my client now, in
6 this deposition. We're not going to do it. Take
7 it to the judge, that's fine with me. Certify it
8 all you want.

9 Mr. Green, no more questions along these
10 lines, answer no more along these lines.

11 MR. JOHNSON: Okay. Are you instructing
12 him -- just to save some time, are you
13 instructing him not to answer any questions about
14 church governance?

15 MR. GANT: Any questions regarding the
16 facts of our case, such as has a property been
17 taken, issues of -- in that manner, yes, I am.

18 MR. JOHNSON: Okay.

19 MR. GANT: Any questions regarding who's
20 taking whose property, any questions regarding
21 issues along those lines specified by our
22 complaint in general, and brought -- our
23 complaint in general, our complaint in general,
24 and brought within that, it's totally relevant.

25 MR. JOHNSON: Okay.

Page 107

1 MR. GANT: Again, it's designed to put my
2 clients, including COGIC, under the gun in a
3 national social media array of display, if you
4 will. I'm not playing that game with you today.
5 Take it to the judge if you want to, that's fine
6 with me. You lost your motion to dismiss on the
7 same basis several months ago. On the same
8 basis. And you know that.

9 MR. JOHNSON: (Crosstalk)

10 MR. GANT: Yes, you do, you know that,
11 Mr. Johnson. You know that. So tell me why it's
12 relevant. Let's back up -- the complaint here.

13 MR. JOHNSON: I'm there.

14 MR. GANT: Look at the complaint that we
15 wrote.

16 MR. JOHNSON: I have a copy of it.

17 MR. GANT: Okay. Well, read it. Read it.

18 MR. JOHNSON: I'm not going to read it into
19 the record. You're welcome to read it, Mr. Gant,
20 if you'd like to.

21 MR. GANT: I'm not going to -- you know
22 what it says.

23 MR. JOHNSON: Is it your -- is it your
24 commentary on the record that this case is not
25 about the ownership and control of three pieces

Page 108

1 of real estate in Escambia County? Is that your
2 commentary?

3 MR. GANT: And those -- my commentary is
4 those properties are -- are held in accordance
5 with Church of God in Christ bylaws and
6 constitution, and which you have a copy of, like
7 it plainly spells out what those bylaws are, what
8 those rules are.

9 MR. JOHNSON: Uh-huh.

10 MR. GANT: Okay?

11 MR. JOHNSON: Uh-huh.

12 MR. GANT: It's clear as glass, if you
13 will. And whether or not an actual president can
14 take property away is an inflammatory question.
15 Inflammatory.

16 MR. JOHNSON: Okay. Did you not just state
17 that the ownership and control of the property is
18 relative to the bylaws or direction that's in the
19 constitution? Did you not just make that
20 statement?

21 MR. GANT: Yes, that's correct.

22 MR. JOHNSON: Okay. So explain on the
23 record, because I'm sure we're going to have a
24 hearing on this --

25 MR. GANT: Sure.

Page 109

1 MR. JOHNSON: -- is how are our questions
2 relative to the bylaws and constitution of COGIC,
3 and the individuals who make those decisions, not
4 relevant to the issues in this case.

5 MR. GANT: Tell me -- tell me where in that
6 book it says that the general bishop -- that the
7 Presiding Bishop has authority to take property
8 away from a church.

9 MR. JOHNSON: Those are my questions.

10 MR. GANT: Tell me -- in those bylaws of
11 the general -- the black book, the certified
12 amendments, where it says the Presiding Bishop
13 can do that. Show me where it says in that book
14 that they can -- you know he can't do -- you know
15 he can't do that. You know he can't. It's
16 inflammatory, Mr. Johnson, plain and simple.

17 MR. JOHNSON: Okay.

18 BY MR. JOHNSON:

19 **Q But I'll ask this question. Then who has**
20 **the authority to take property from a local church?**

21 A I'm not sure if I understand your question.

22 **Q What part of my question do you not**
23 **understand?**

24 A When you say "take property from a local
25 church," what are you talking about?

Page 110

1 Q Talking about real estate.
2 A The real estate of the local church is held
3 in trust for the membership of the Church of God in
4 Christ, in that local church and in Memphis,
5 Tennessee. So you can't take something from the local
6 church because the local church property is held in
7 trust, and you know that. Mr. Watts does not own
8 2313 G Street, 51 Marshall Lane, 1100 Yonge Street.
9 He doesn't own it. The board of trust --
10 Q Does Mr. Green own it?
11 A Will you allow me to answer?
12 Q Sure.
13 A If you're going to answer, don't ask me the
14 question. Go ahead.
15 Q Go ahead, answer.
16 All right. I'll continue. Does Mr. Green
17 own 51 Marshall Lane?
18 A Mr. Green doesn't want to own 51 Marshall
19 Lane because he's not -- it's not his property. The
20 property at 51 Marshall Lane is held in trust for the
21 Westside Church of God in Christ. It was a member
22 church in the Church of God in Christ, whose
23 headquarters are in Memphis, Tennessee. I don't own
24 it and don't want to own it. I told you what
25 properties I own.

Page 111

1 Q So if you don't own it, could you convey
2 it? Could Mr. Green convey 51 Marshall Lane?
3 A I can if I'm a member of the board of
4 trustees appointed either -- or -- either appointed or
5 elected. Board of trustee members don't own it, they
6 hold property in trust for the church, as stipulated
7 in the constitution of the Church of God in Christ.
8 Q What does that mean, they hold the property
9 in trust?
10 A I think you went to school --
11 MR. GANT: I object, legal -- that's a
12 legal answer. He's not an attorney.
13 A I think you went to school --
14 MR. JOHNSON: I'm not the one who used the
15 term. If the -- hold on. If the witness uses
16 that term, I have every right to ask him what he
17 means by that. Do you disagree?
18 MR. GANT: Again, this is not a corporate
19 witness, this is a fact witness, okay?
20 MR. JOHNSON: Who would be a corporate
21 witness, Mr. Gant?
22 MR. GANT: If you depose someone -- depose
23 someone within the Church of God as Christ as a
24 deponent, then they -- they -- if they give you
25 somebody to come as a representative, then that

Page 112

1 person would be the person who speaks for COGIC.
2 THE STENOGRAPHER: Can you please slow --
3 I'm sorry.
4 MR. GANT: I'm sorry.
5 THE STENOGRAPHER: Can you please repeat
6 what you said?
7 MR. GANT: That person who Church of God in
8 Christ appoints to be their representative --
9 MR. JOHNSON: Okay.
10 MR. GANT: -- would be the person that
11 speaks for COGIC.
12 MR. JOHNSON: All right. So the individual
13 who filed the lawsuit and signed the complaint is
14 not an individual that's an agent of COGIC; is
15 that your position?
16 MR. GANT: We're not talking about that.
17 MR. JOHNSON: I am talking about that.
18 MR. GANT: We're not talking about --
19 MR. JOHNSON: You lodged an objection, and
20 you're --
21 MR. GANT: That's not an issue.
22 MR. JOHNSON: You're telling me that the
23 client can't answer the question, yet he signed
24 the complaint.
25 MR. GANT: You deposed Bishop Green as a

Page 113

1 fact witness, an individual witness, okay?
2 MR. JOHNSON: Except when he signs a
3 complaint, then he's a corporate witness?
4 MR. GANT: That's a fact. Okay? That's a
5 fact.
6 MR. JOHNSON: Okay. Then how did he have
7 the authority to file the complaint if he's not a
8 corporate witness?
9 MR. GANT: Within the bylaws of the Church
10 of God in Christ, he does.
11 MR. JOHNSON: Great. Let's ask about that.
12 BY MR. JOHNSON:
13 Q Show me -- or tell me where in the bylaws
14 or in the proof -- or the Book of Certified Amendments
15 does it provide you the authority to file a lawsuit on
16 behalf of Church of God in Christ.
17 A It tells you in the official manual that
18 the Jurisdictional Bishop -- I am the Jurisdictional
19 Bishop, and I -- and this is also in the filing, by
20 the way, that I think we made before you before -- is
21 the representative of the Church of God in Christ in
22 all ecclesiastical matters that occur in his
23 jurisdiction. All matters.
24 Q Okay.
25 A So I can read it for you if you give me the

Page 114

1 book.

2 Q And is this an ecclesiastical matter?

3 A It is.

4 Q Okay.

5 A Because it involves the church.

6 Q All right. So would you agree, then, that

7 the Court would not have jurisdiction over an

8 ecclesiastical matter?

9 A Well, no -- if you give me the book, I'll

10 read it to you. Because the issue for me is not about

11 who's in charge of the church, it's about who is

12 responsible for making sure that the church property

13 is properly taken care of, and that's my job.

14 Q But you agree this is an ecclesiastical

15 matter?

16 A If you show me the book, I'll read it to

17 you --

18 Q My question is --

19 A Because the issues here --

20 Q My question is --

21 A The issues here are not ecclesiastical in

22 the sense that you're trying to use the word, but the

23 word that I'm looking for in the book itself actually

24 talks about --

25 Q Okay.

Page 115

1 A -- matters in his jurisdiction. And so

2 that gives me the authority. As I've said from day

3 one, I have the authority, as stated in the Church of

4 God in Christ official manual --

5 Q Okay.

6 A -- to handle this issue in my jurisdiction.

7 Q All right. Are you done?

8 A I am.

9 Q Okay. Let the record reflect I'm handing

10 you a copy of the official manual. To my knowledge,

11 it's complete.

12 A Let's see -- in fact, you've got it --

13 you've got it already underlined and -- in your book,

14 and in color, and I'll read it for you.

15 Q Can you give us the --

16 A It's on page 18.

17 Q Okay. Can you give us the article, and the

18 paragraph number or letter?

19 A I sure can. It's Article 4, which deals

20 specifically with jurisdictional bishops. It's under

21 section A, number 2, a Jurisdictional Bishop -- it's

22 actually 3. "Each Jurisdictional Bishop shall be the

23 representative of the Church of God in Christ in

24 respect to all church matters."

25 Q Are you done?

Page 116

1 A No, I want to read it. Because that's what

2 I said to you earlier --

3 Q You just paused.

4 A -- in respect to all church matters. You

5 tried to make it ecclesiastical. But it says "all

6 church matters to -- in his ecclesiastical

7 jurisdiction, and shall have general supervision over

8 all departments and churches in his jurisdiction."

9 The issue with you was about whether it was

10 an ecclesiastical matter. The jurisdiction is an

11 ecclesiastical jurisdiction. In fact, our official

12 name is the Ecclesiastical Jurisdiction of Florida

13 Northwest.

14 Q I want you to keep that for a minute.

15 Is there any other provision or section in

16 that book that you contend provides a Jurisdictional

17 Bishop the authority to file a lawsuit on behalf of

18 COGIC?

19 A I filed the lawsuit based on what's in this

20 book, and I just read it to you.

21 Q I'm going to ask the question again. Did

22 you not understand my question?

23 A I understand your question because of what

24 I've answered your question.

25 Q I have a right to a direct answer.

Page 117

1 A You can ask it. Ask it again.

2 Q All right. Is there any other provision in

3 that book, other than what you just read for us, that

4 you contend provides the authority of a Jurisdictional

5 Bishop to file a lawsuit on behalf of COGIC?

6 A Asked and answered.

7 Q You didn't ask and answer. And this is my

8 deposition and I'm entitled to an answer.

9 MR. GANT: I object --

10 A You can ask it a hundred times.

11 MR. GANT: I object, argumentative.

12 MR. JOHNSON: Are you instructing him not

13 to answer?

14 MR. GANT: Asked and answered.

15 MR. JOHNSON: It's not asked -- he didn't

16 tell me whether there was any other section in

17 that book. That was my question, Fred. Are we

18 really going to do this all day? That was my

19 question. I'm 100 percent positive that

20 Miss Dana here can read it back to you.

21 MR. GANT: That's fine. Ask your question.

22 I'm sorry. I apologize. That question is okay.

23 MR. JOHNSON: It's the question I just

24 asked.

25 MR. GANT: Well, that's fine.

Page 118

1 MR. JOHNSON: So what are we doing here?
2 MR. GANT: That's fine. Come on, now.
3 MR. JOHNSON: This is like a circus.
4 MR. GANT: You're the circus.
5 BY MR. JOHNSON:
6 Q Can you please answer that question?
7 A I don't want --
8 Q Is there any -- is there any other
9 provision in that book?
10 A I don't want to be a part of a circus. I
11 don't want to be a part of any media event that you've
12 got going on. I've answered your question. I read to
13 you what my authority is, granted to me by the
14 constitution of the Church of God in Christ as a
15 Jurisdictional Bishop. I've stated it in the
16 complaint. I responded to it. And when you've
17 written other things about who had authority to do
18 what, I've answered your question. This is my
19 authority as a Jurisdictional Bishop.
20 Q Okay. Are you aware of any other
21 authority?
22 A I've already answered your question.
23 Q No, you haven't, sir. You said that was
24 your authority. My question, are you aware of any
25 other authority that gives you the power to file a

Page 119

1 lawsuit on behalf of COGIC, Inc.?
2 A This is my authority when I said -- that is
3 my authority. You're a smart man. I've referenced --
4 that pronoun references exactly what I read. That is
5 my authority.
6 Q So are you refusing to answer the question?
7 A Asked and answered.
8 Q Bishop Green, are you aware -- well, you
9 know who General Counsel John Saffold is, correct?
10 A I do.
11 Q Okay. Are you aware that he has written a
12 letter to both Mr. Gant and I that specifically states
13 that you did not have the authority to file that
14 lawsuit?
15 A I was told that. And he did not send me a
16 copy of that letter, because if he had sent me a copy
17 of the letter, I would have told him the same thing
18 I've told him subsequent to being told that.
19 Q Okay. In your opinion, is General Counsel
20 Saffold familiar with the rules and regulations
21 governing COGIC?
22 A I can't answer his familiarity with any
23 rules in COGIC. I know his position as general
24 counsel in the Church of God in Christ should speak to
25 his knowledge of the rules and regulations of the

Page 120

1 Church of God in Christ. But I can't speak to his
2 level of knowledge.
3 Q Is it your testimony that you have not seen
4 that correspondence from General Counsel Saffold?
5 A That was not my answer. My answer --
6 MR. GANT: I object to that line of
7 questioning. Again, the issue was tried before
8 Judge Brodersen earlier this year. Issue whether
9 Mr. Green had the authority to represent COGIC
10 was addressed by Judge -- it was raised by the
11 defendants, heard by the judge. It did not carry
12 the day. She did not approve that allegation
13 that you lodged against Mr. Green.
14 So now to try it again in this venue, in
15 this deposition, when you know it's not an issue
16 before the Court -- it's not before the Court.
17 The purpose is to -- to -- to think about
18 division among the COGIC organization, these
19 issues that you know that aren't relevant before
20 the Court now. And as you mentioned earlier,
21 just start a circus on its own social media.
22 THE WITNESS: Yeah.
23 MR. GANT: The bad part is you want
24 Bishop Green to be a part of the circus. That's
25 the bad part. I cannot let him do that, okay?

Page 121

1 So you take it to the judge.
2 Mr. Green, along those lines, what
3 Mr. Saffold said or didn't say regarding your
4 authority to represent the church, don't answer
5 any questions along those lines. Okay?
6 THE WITNESS: Yes, sir.
7 MR. JOHNSON: All right.
8 BY MR. JOHNSON:
9 Q Okay. I want to go back and talk about --
10 I want to back up for a second.
11 Mr. Green, do you agree with me that some
12 of the issues in this case involve a piece of real
13 property in Escambia County, Florida, referenced as
14 51 Marshall Lane?
15 A Do I agree with you that some of the
16 issues? Yes.
17 Q Okay. Do you agree with me that some of
18 the issues in this case involve real property in
19 Escambia County, Florida, referenced as 1100 West
20 Yonge Street?
21 A Yes.
22 Q Do you agree with me that some of the
23 issues in this case involve a piece of real
24 property in Escambia County, Florida, referenced
25 as 2313 G Street?

Page 122

1 A Yes.

2 Q All right. Okay. Is it accurate to say

3 that you already testified that you personally do not

4 own 51 Marshall Lane?

5 A That's correct.

6 Q All right. And is it accurate to say that

7 you already testified that you personally could not

8 sell or convey 51 Marshall Lane?

9 A I've said that I don't personally own

10 51 Marshall Lane. I don't personally own 2313 G

11 Street. I don't personally own 11 West Yonge Street.

12 I'm not personally trying to steal anybody's property,

13 as you-all have alleged. I'm not personally try to

14 sell anybody's property. So we can agree on those

15 points.

16 I have a job as a Jurisdictional Bishop to

17 safeguard properties, those three pieces of property

18 that you've just referenced, I have a responsibility

19 as the leader of the Ecclesiastical Jurisdiction of

20 Florida Northwest, and I will continue to carry out my

21 responsibilities in that regard.

22 Q Do you believe you have the authority to

23 lease 51 Marshall Lane?

24 A Do I have -- do I believe that I have the

25 authority to lease 51 Marshall Lane?

Page 123

1 Q Uh-huh.

2 A This piece of property, and the other two

3 pieces of property --

4 Q I'm just asking you about one, 51 Marshall

5 Lane.

6 A Would you allow me to answer the question?

7 Q I will ask -- I'll allow you to answer the

8 question about 51 Marshall Lane. That's the question

9 pending. Do you have the authority to lease

10 51 Marshall Lane?

11 A In my capacity as Jurisdictional Bishop,

12 under my authority and under my control, if I wanted

13 to lease it as the pastor, with the approval of the

14 board that may be available -- because the board that

15 you keep talking about doesn't have that authority

16 anymore because I'm the pastor of that church.

17 And the way we handle the process in the

18 Church of God in Christ is that we go through

19 procedures in order to do that. I personally --

20 because you're talking about personally. I don't

21 personally take responsibility for leasing 51 Marshall

22 Lane or any other piece of property.

23 Q Have you ever personally given any money to

24 Pastor Watts or Westside Ministry or any other local

25 church, relative to the financing of the property at

Page 124

1 51 Marshall Lane?

2 A I am certain that I've given personal

3 monies, offerings, to Pastor Watts. In fact, under my

4 leadership, the jurisdiction often gave back monies to

5 local churches, from the jurisdictional level, that

6 came out of money that came to the jurisdiction. And

7 I've done that.

8 Q My question is, have you personally

9 provided funds to the church at 51 Marshall Lane to be

10 contributed toward the financing of the construction

11 of that building?

12 A And that was not your question. You said

13 or any other churches, so I answered that question.

14 Now, what he did with the monies that I

15 gave to him, I never gave him a dollar and said this

16 is for the purchase or this is for the building or the

17 work that you've got going on. But I have given him

18 offerings and I've given him monies from the

19 jurisdictional treasury.

20 Q Was it out of your own pocket, or was it

21 the Northwest Florida Jurisdiction?

22 A I have given offerings to him out of my own

23 pocket. It's not my -- but that's in my role as a

24 Jurisdictional Bishop. I've made visits to his

25 church -- he can smile all he wants to. She can, too.

Page 125

1 That's a fact. And --

2 Q Can you tell me when and how much?

3 A I've been here -- no, I can't tell you how

4 much I've given, and I can't tell you a specific day.

5 But as my manner was, whenever I visit a church, I

6 always gave an offering. And I've visited his church

7 and I've given offerings before.

8 Now, what they did with it was totally up

9 to them. But I didn't give them a piece of money and

10 said, this is for your building fund, or this is for

11 the pews in that church, or this is for et cetera.

12 But I have given monies to that church.

13 Q Have you ever given monies to the church

14 for the maintenance of that property?

15 A I have no need to give them money for the

16 maintenance of the property because that's their

17 responsibility. That's their responsibility, not

18 mine.

19 Q My question, though, is, have you ever

20 given money for the maintenance of that property?

21 A I answered your question.

22 Q No, you didn't.

23 A I did.

24 Q Sir, you said you had no need to. Maybe

25 nobody else in this room does things they have no need

Page 126

1 to, but I will tell you that I do, often do things I
2 have no need to do.
3 So my question to you is, regardless of
4 whether you feel you have a need to, have you ever
5 given money to that church for the maintenance of that
6 property at 51 Marshall Lane?
7 A Asked and answered.
8 Q Sir, I --
9 MR. JOHNSON: Can you please tell your
10 client to answer that question?
11 MR. GANT: Can my client --
12 MR. JOHNSON: I mean, how can it be any
13 clearer?
14 MR. GANT: -- client tell you if he gave
15 money to Pastor Watts' church --
16 MR. JOHNSON: Yeah.
17 MR. GANT: -- as bishop of the
18 jurisdiction, from the coffers?
19 MR. JOHNSON: I didn't ask that.
20 MR. GANT: Or he made a contribution out of
21 his own pocket for that church? He said I
22 couldn't tell them how to use the money, but I
23 gave them money for whatever purpose they wanted
24 to use it for --
25 THE STENOGRAPHER: You -- I'm sorry, I'm

Page 127

1 having a difficult time.
2 MR. GANT: I'm sorry. I'm sorry.
3 THE STENOGRAPHER: Can you --
4 MR. GANT: Whatever purpose they wanted to
5 use the money for, it's up to them. But he gave
6 them money out of his pocket and from the
7 jurisdiction coffers in the past.
8 MR. JOHNSON: I'd like the witness to
9 answer my question, which is has he ever provided
10 money for the maintenance of that property, him
11 personally.
12 THE WITNESS: Asked and answered.
13 MR. JOHNSON: Do you have a basis for him
14 not answering?
15 MR. GANT: No, you -- it's your question,
16 you ask him.
17 MR. JOHNSON: I did. Counsel, I've asked
18 him three times. I'm asking you to control your
19 client. If you have an objection --
20 MR. GANT: My client is --
21 MR. JOHNSON: -- where I'm not entitled --
22 hold on. If you have an objection where I'm not
23 entitled to the answer because it's confidential
24 or something like that, then say that for the
25 record. But I think we're all under -- operating

Page 128

1 under court rules that allow me to ask questions
2 to witnesses that are germane to the issues in
3 the case. And because these three properties are
4 at the center of the issues raised in this case,
5 then my position is I have certainly the
6 authority to ask questions relative to
7 contributions made toward the maintenance of any
8 of these three properties, or the financing of
9 them and that -- and so -- so that's my position.
10 MR. GANT: I think my client means that his
11 first answer about giving money to Pastor Watts
12 from his pocket over time, and secondly, giving
13 money from the jurisdictional coffers over time,
14 would be for maintenance, building constructions,
15 lights and water, whatever that they want to use
16 it for. He's given money to them for the
17 purposes they want to use it for. That's his
18 answer. Whether it'd be maintenance, building
19 construction, or utilities, it's the same answer.
20 MR. JOHNSON: So are you testifying or is
21 he testifying?
22 A No, I told you that. I told you when you
23 asked the question, I can't tell you what they used
24 the money for, but I've given them money.
25 Specifically did they use it for maintenance? That's

Page 129

1 their issue, not mine. I didn't give them a dollar
2 and say, use this dollar to clean the church. I
3 didn't give them a dollar and say, use this dollar to
4 pay the electric bill. But I've answered your
5 question. When you asked me, I answered it.
6 BY MR. JOHNSON:
7 Q Does Northwest Florida Jurisdiction own the
8 property at 51 Marshall Lane?
9 A Northwest Florida Jurisdiction does not own
10 the property at 51 Marshall Lane.
11 Q Could Northwest Florida Jurisdiction sell
12 that property?
13 A Northwest Florida Jurisdiction cannot sell
14 the property at 51 Marshall Lane.
15 Q Could Northwest Florida Jurisdiction lease
16 that property?
17 A Northwest Florida Jurisdiction, depending
18 on what the circumstances are, may be able to lease
19 that property.
20 Q All right. You may have already given the
21 answer to this question, I acknowledge that, but I
22 want to clarify. Has Northwest Florida
23 Jurisdiction -- not you. Has Northwest Florida
24 Jurisdiction any -- given any money to Pastor Watts or
25 the ministry to help finance that building?

Page 130

1 A I've answered your question, but I'll
2 answer it again, when I talked about what I've given,
3 both as an individual and as a bishop of the
4 jurisdiction. Northwest Florida Jurisdiction has
5 given funds to the -- Pastor Watts and the church.
6 Whatever they used it for was up to them.

7 Q All right. To your knowledge, does
8 Attorney John Saffold own the property at 51 Marshall
9 Lane?

10 A You'd have to ask Attorney John Saffold
11 what he owns. I don't know what he owns and what he
12 doesn't own.

13 Q Well, you've filed a lawsuit relative to
14 the ownership and control of these three pieces of
15 property, have you not?

16 A Yes, that's correct.

17 Q Okay. So you agree with me that the
18 ownership and control of this property is -- are
19 central issues in this case, correct?

20 A One of the issues in the case, yes, that's
21 obvious.

22 Q So, to your knowledge, does Attorney John
23 Saffold own the property referenced as 51 Marshall
24 Lane?

25 A I can't tell you what Attorney Saffold owns

Page 131

1 or does not own.

2 Q Okay. To your knowledge, has Attorney John
3 Saffold ever provided any funds to Pastor Watts or the
4 ministry relative to either the financing of the
5 property, for assistance in maintenance or repairs,
6 for taxes or for property insurance?

7 A I can't tell you what Attorney Saffold has
8 given to anyone, Pastor Watts, you, me or anyone else,
9 for taxes, et cetera, et cetera. I can't tell you
10 that because I don't know.

11 Q My question was to your knowledge.

12 A I just told you I don't know.

13 Q There you go. That's an answer. If you
14 don't know, it's an okay answer.

15 A I've answered every one of your questions.
16 You may not have liked the answer, but I've answered
17 all of your questions, and I will continue to answer
18 them unless I'm advised not to by my attorney.

19 Q Does the General Assembly own the church on
20 Marshall Lane?

21 A Does the General Assembly own the church?
22 The General Assembly -- I can't tell you what the
23 General Assembly owns or does not own.

24 Q Okay. If the General Assembly owned the
25 church on Marshall Lane, would you have filed this

Page 132

1 lawsuit?

2 A I can't tell you what I would have done if
3 the General Assembly had owned the church on Marshall
4 Lane. It would depend on the circumstances, in terms
5 of what action I would have taken. You're asking me
6 about hypotheticals. It's hard to say what I would do
7 in a hypothetical situation.

8 Q Okay. I can represent to you that I've
9 read your complaint several times. Have you read your
10 complaint?

11 A I have.

12 Q Okay. Who are you alleging owns the
13 property at 51 Marshall Lane?

14 A The property is held in trust for the use
15 and benefit of the members of the local church, with
16 headquarters in Memphis, Tennessee. That's the way
17 it's held and owned. And who owns it is a matter of
18 how you interpret the constitution of our church.

19 Q How do you interpret the constitution of
20 your church?

21 A As long as it's written the way it is, I
22 believe that the property, in general is held in trust
23 for the use and benefit of the members of the local
24 church, and as long as they're in the Church of God in
25 Christ. That's what I believe.

Page 133

1 Q Okay. All right.

2 A No individual owns the church. I'm sure
3 you know -- or you should know that. It's held in
4 trust.

5 Q What does that mean? You keep using that
6 phrase, that it's held in trust. What does that mean
7 to you?

8 A What it means to me is just what I said, no
9 individual owns the property. In terms of the
10 corporate status, the property is held in trust for
11 the use and benefits, and I don't know any other way
12 to explain it. You're an attorney. You should
13 know -- in fact, you're a real estate attorney, you
14 should be able to tell me what -- you've handled real
15 estate -- in fact, you did most of these conveyances,
16 where you conveyed this property over the years, these
17 properties over the years to a variety of people, so
18 you should be telling me what a trust is. I just
19 explained to you my knowledge, in terms of what I
20 think it means.

21 Q As we sit here today, you're under the
22 impression that I conveyed this property?

23 A Am I what now?

24 Q You're -- you just made a statement that I
25 conveyed this property.

Page 134

1 A No, I didn't say you conveyed the property.
2 I may -- if I did say that, that was a misstatement.
3 But I'm sure you wrote up most of the conveyance
4 instruments involving these three pieces of property.
5 As my memory served me correctly, I think you were the
6 attorney of record on many of these conveyances
7 involving 2313 G Street, 1100 Yonge Street, and
8 51 Marshall Lane. I may be wrong, but I think I read
9 such that you wrote up most of these instruments.
10 Q Okay. So I'm going to ask -- I know you
11 feel you answered this question, but I want a direct
12 answer to the question. Does the General Assembly of
13 COGIC own the church on Marshall Lane?
14 A I can't tell you what the General Assembly
15 owns. I've answered the question.
16 Q Could the General Assembly sell that
17 property?
18 A Asked and answered.
19 Q It hasn't been asked and answered. I
20 haven't asked that question.
21 A I can't tell you what the General Assembly
22 can sell and not sell.
23 Q Are you familiar with the constitution of
24 COGIC as represented by this little black book? I
25 don't know where it went, but I've got it somewhere.

Page 135

1 A I have it on my phone, by the way. I don't
2 have to pull it up on the pages, I have this on my
3 phone, if I need to pull it up and find something.
4 Q Okay. So my question is, are you familiar
5 with that?
6 A I am.
7 Q Okay. According to all of the items in the
8 black book, can the General Assembly sell the
9 property?
10 A I can't tell you what the General Assembly
11 can and cannot do. I've answered your question.
12 Q Is it accurate that what the General
13 Assembly can and cannot do is laid out in that black
14 book?
15 A Everything that the General Assembly can
16 and cannot do is not laid out in this black book, nor
17 any other document. Everything they can and cannot
18 do -- I mean, you say everything they can and -- can
19 they drink water? That's not spelled out in this
20 book.
21 Q Is it spelled out in that book that they
22 could sell that property?
23 A I haven't read it in there.
24 Q Is it spelled out in that book that they
25 could lease the property?

Page 136

1 A I haven't read it in the black book.
2 Q So is it in there?
3 A I have -- the fact that I haven't --
4 Q You've read the black book --
5 A -- read it --
6 Q -- you say you've --
7 A I've read it --
8 Q -- you've got it on your phone.
9 A Yeah, I've read it many, many times, just
10 like I've read the Bible many, many times. But if you
11 ask me something specific about whether or not this is
12 in the black book, I can tell you I haven't read it in
13 there.
14 Q But you're familiar with it, right?
15 A Being familiar, and having knowledge and
16 memory of every word and phrase, are two different
17 things.
18 Q Would you say the same thing about the
19 Bible?
20 A I would absolutely say that about the
21 Bible.
22 Q But you've read the whole thing?
23 A I've read it several times.
24 Q Okay.
25 A But I can't tell you every word that's in

Page 137

1 the Bible if you asked me a question. Or what did
2 Jesus do at a certain, certain place. I've read it a
3 100 times, but I have to go back and look at it again
4 to refresh my memory.
5 Q All right. Does COGIC base their policies
6 and procedures on Biblical principles?
7 A The Church of God in Christ is grounded in
8 Biblical principles. In fact, that's the foundation
9 of our church, as I believe it.
10 Q Okay. And Biblical principles are set
11 forth in the Holy Scripture that we refer to as the
12 Holy Bible, correct?
13 A That's what I believe.
14 Q Okay. And are the jurisdictional bishop's
15 actions and powers grounded in Biblical principles?
16 A That's what I believe.
17 Q All right. Can you describe for me the
18 Biblical principles that underlie this lawsuit?
19 MR. GANT: I object. Relevancy.
20 MR. JOHNSON: Well, the relevancy is he
21 just told me that COGIC and the jurisdictional
22 bishops are ground in Biblical principles.
23 BY MR. JOHNSON:
24 Q So my follow-up question is, what Biblical
25 principles are pertinent to this lawsuit?

Page 138

1 A I believe that all of us are accountable.
2 We're accountable in the corporate structure of the
3 Church of God in Christ. I'm accountable to the
4 General Assembly, Presiding Bishop and General Board.
5 And we have supervisory authority. We have to know
6 what our duties and responsibilities are. A Christian
7 principle is to be obedient, and to abide by the rules
8 that you are asked to abide by, whether it's in a
9 corporate structure, on the job, or wherever.
10 I believe in Biblical principles and I
11 believe the Church of God in Christ is based on
12 Biblical principles, and part of that principle
13 requires accountability. I'm accountable to COGIC.
14 Watts and Westside are accountable to me, as a
15 Jurisdictional Bishop. We're all accountable to
16 following the Bible and the constitution of our
17 church. That's what I believe.
18 **Q Okay. If a local church wished to convey**
19 **real property, what is the process or procedure that**
20 **they must go through?**
21 A When you talk about a local church, are you
22 talking about a local COGIC church?
23 **Q Of course.**
24 A Well, if you're talking about a local COGIC
25 church, the first thing that local COGIC church needs

Page 139

1 to do is make the Jurisdictional Bishop aware of their
2 intent to sell or convey that property to someone
3 else.
4 **Q Is it also --**
5 A (Crosstalk) --
6 **Q Go ahead.**
7 A I'm sorry. You want my answer, or you
8 already got an answer?
9 **Q Well, my follow-up question is, is what you**
10 **just testified to, is that present in the official**
11 **manual?**
12 A There is somewhere in the official manual
13 or in the Book of Certified Amendments that says that
14 the local property cannot be sold without the approval
15 of the Jurisdictional Bishop. And if you give me a
16 book and give me about an hour, I can find it for you.
17 **Q Okay.**
18 A Give me about an hour so I can find it
19 specifically for you. But it's in there. And maybe
20 not in those explicit terms, but the property of the
21 local church, before it's sold or conveyed to anyone,
22 should be approved by the Jurisdictional Bishop.
23 Okay.
24 And there also should be, as a part of the
25 rules of our church -- and this is not written in --

Page 140

1 explicitly in the constitution itself. There should
2 be -- because I studied this as a Jurisdictional
3 Bishop before they made me a Jurisdictional Bishop.
4 There should be a resolution to sell that property by
5 the local church before any actions are taken to sell
6 that property. Whether it's the church building or
7 whether it's the parsonage, no local church has the
8 authority to sell its parsonage to officers in that
9 church below the appraised value of that property,
10 without getting the proper approval.
11 **Q Okay. What about the -- I'm sorry. Who**
12 **doesn't have the authority to sell the property?**
13 A No local church, not even the board of
14 trustees, to sell that property without getting the
15 approval of the Jurisdictional Bishop and without a
16 resolution to sell.
17 **Q Okay.**
18 MR. JOHNSON: I'm sorry. I'm sorry to do
19 this. Are you able to read -- read back his last
20 statement before the very last one? The
21 second-to-last statement.
22 (Thereupon, the aforementioned testimony
23 was read by the reporter as recorded above.)
24 MR. JOHNSON: Thank you.
25 BY MR. JOHNSON:

Page 141

1 **Q What is the proper approval?**
2 A I think I just articulated it. If a local
3 church wants to sell or convey a piece of property to
4 anyone, based on my authority as the person who's
5 given supervision of that jurisdiction, the local
6 church should make the Jurisdictional Bishop -- when I
7 say "me," I'm talking about the Jurisdictional Bishop.
8 The Jurisdictional Bishop should be contacted, made
9 aware of that, and it should be given -- his approval
10 should be given, first of all, about the intent.
11 Because the property is not owned by the trustee
12 board, it's held in trust. We keep coming back to
13 this same issue. When you hold property in trust, you
14 don't have the liberty to do what you want to do with
15 it when it comes down to conveying it or selling it.
16 **Q For example.**
17 A You've got --
18 **Q For example.**
19 A You've got to --
20 **Q Go ahead, finish.**
21 A You've got to go through the proper
22 procedure to get that done.
23 **Q And part of the proper procedure, wouldn't**
24 **it be, is that the trustee board for the local church**
25 **would have to vote on it and approve the sale,**

Page 142

1 correct?

2 A Well, you've gotten ahead of the game,
3 because before the trustee board ever gets to vote on
4 something of that nature, it should have come already
5 through the Jurisdictional Bishop, and the -- that
6 approval should be granted in advance of any vote by
7 the trustee board.

8 Q So, for example, if a local church were
9 asked to sell a piece of their property to a
10 Jurisdictional Bishop, how would that be handled?

11 A If the local church was asked to -- I don't
12 know of any instance in that case, because you--all
13 have made a lot of lies out there, claiming that
14 Bishop Green is trying to own some property. There is
15 nowhere, that I read, that the local church had to
16 sell property to Jurisdictional Bishop Green.

17 Q Okay.

18 A The local church has an obligation to make
19 sure that they follow all of the rules before they
20 convey the property to anyone. And if it came from
21 the national church, if the national church says,
22 we're giving you the authority to do such a thing,
23 that's the end of the story. Then you follow through
24 on what the national church is asking you to do,
25 especially if you agreed to do that.

Page 143

1 But I'm not aware of anything from the
2 national church that has told any local church to sell
3 property to Bishop Willie C. Green. That's a lie
4 you--all have put out there, accusing Bishop Green of
5 trying to own personal property that he never -- I
6 don't want that property for personal -- for personal
7 use, for personal use --

8 Q Are you --

9 A -- or personal ownership.

10 Q Are you aware that the only reason we're
11 sitting here is because the -- and I could be wrong,
12 but I can tell you it's the understanding of myself
13 and my clients that the only reason this case hasn't
14 resolved is because that COGIC, by and through the
15 general counsel's office and your attorney, have been
16 told that we had to sell that property to Bishop
17 Willie Green.

18 MR. GANT: I object --

19 A Let me -- I want to answer that.

20 MR. JOHNSON: I want to know if he's aware
21 of that.

22 MR. GANT: I object that Mr. Johnson asked
23 a question that's not factual. He assumed what
24 someone else knows to be the case, in kind of
25 saying that the national church did something

Page 144

1 that precluded the case from being resolved.
2 I mean, no foundation to your question.
3 What is that question? What are you asking?
4 MR. JOHNSON: Is that an objection?
5 MR. GANT: That's an objection.
6 MR. JOHNSON: Are you telling him not to
7 answer?
8 MR. GANT: Nebulous.
9 MR. JOHNSON: Are you telling him not to
10 answer?
11 MR. GANT: It's confusing, unclear.
12 MR. JOHNSON: Okay.
13 MR. GANT: If he can.
14 A I'm glad to hear him say that that's his
15 problem and their problem, because I don't know what
16 he's talking about. I have not read anything, I have
17 not read any order from any General Assembly or
18 Attorney Saffold or anybody that says that the
19 property on G Street has to be sold to Bishop Willie
20 C. Green. That's a lie. That's a lie that's been put
21 out --
22 BY MR. JOHNSON:
23 Q Is it possible --
24 A -- period.
25 Q -- that it's not a lie, but a

Page 145

1 misunderstanding?
2 A No, it's a lie. Because if you're going to
3 tell something like that, you've got to be able to
4 show somebody something in writing.
5 Q Okay. And I'm glad you --
6 A And what you've showed me -- if you'll let
7 me finish.
8 Q I sure will.
9 A If what you've showed me as a part of its
10 committee's report -- as part of the committee's
11 report in mediation, when they were trying to resolve
12 this issue between your client, they made a proposal
13 in the report that the property on G Street be
14 reconveyed to the jurisdiction. There's a difference
15 between the jurisdiction of Bishop Green. I'm the
16 Jurisdictional Bishop. I don't want to own -- I have
17 enough property that I have to take care of myself.
18 You heard me talk about the pieces that I have. I'm
19 not interested in owning property on G Street. Don't
20 want it. Didn't ask for it.
21 So if you're putting that lie out, you need
22 to correct that tomorrow or show me something in
23 writing --
24 Q Okay.
25 A -- that says that. Because nothing I've

Page 146

1 read, other than what your guy -- that Moses Tyson,
2 Jr., and his little people out there, they post that
3 stuff out there. But that didn't come from COGIC.
4 **Q How did they get that impression?**
5 A I don't know -- I can't tell where you got
6 the impression from. You didn't get it from me, and
7 you didn't get it from anything that I've said or
8 done. And if you pay attention to what's out there, I
9 don't respond to any of the foolishness. Because this
10 case, from my opinion, is going to be resolved in the
11 courts, and it's going to be resolved on the facts as
12 we have presented them. Nobody in here -- you can't
13 tell me, and neither can your clients tell me that
14 they've seen anything in writing where they've been
15 told that they've got to sell property to Bishop
16 Willie C. Green.
17 **Q Well, I don't think that was my question.**
18 A If I'm wrong -- if I'm wrong --
19 **Q Okay.**
20 A -- I will say I'm sorry. But I haven't --
21 **Q Okay.**
22 A -- seen anything like that.
23 **Q All right.**
24 A Your question -- I answered your question.
25 **Q May I move on? May I move on?**

Page 147

1 A You said that's the only reason why we're
2 here. So once we get that resolved, we can move on.
3 **Q Do you want to resolve it off the record?**
4 **Because the record is me asking you questions. But**
5 **I'm representing to you that as far as we know, that's**
6 **the whole reason we're here.**
7 A I'm telling you --
8 **Q You may think I'm lying, but I'm telling**
9 **you --**
10 A I do think you -- I'm not going to call you
11 a liar because --
12 **Q Well, then you're being disingenuous. You**
13 **can't tell somebody you're a liar, and then say --**
14 A I think you're --
15 **Q -- it's not personal.**
16 A I think you're misrepresenting the truth
17 here.
18 **Q Okay. So I'm going to ask you to look at**
19 **what has been previously marked as, I think,**
20 **Exhibit B. Can you take a look at that?**
21 A I know what it says.
22 **Q Okay. What I'm going to direct you to**
23 **is -- oh, and by the way, at the top of Exhibit B, it**
24 **is labeled Joint Order, correct?**
25 A Yes, that's what it says.

Page 148

1 **Q Okay.**
2 MR. GANT: I object to Exhibit B being in
3 evidence in this proceeding. I object --
4 MR. JOHNSON: Okay, but --
5 MR. GANT: -- as far as any questions
6 regarding Exhibit B to Mr. Green. I object to
7 any questions regarding Exhibit B being asked to
8 my client. That has been resolved by Judge
9 Brodersen in open court. You made your
10 allegations, your arguments, verbally and on
11 paper, both. I'm not going to be a party to
12 trying to undo what the judge has did on such a
13 central and clear issue, and jurisdiction.
14 Secondly, this paper is part of a mediation
15 process, which is confidential, okay? It's not
16 to be shared -- shared as a matter of course.
17 To the extent my client has already told
18 things about the document -- let me start over.
19 He wasn't even a party to this document.
20 He was not a party to the document. So he cannot
21 speak about this document, secondly.
22 So no, no questions about this document are
23 to be answered by my client, Mr. Green.
24 MR. JOHNSON: Okay.
25 MR. GANT: No questions answered, okay?

Page 149

1 MR. JOHNSON: Okay.
2 BY MR. JOHNSON:
3 **Q I'm going to ask the question. All right.**
4 **Have you read paragraph 4 on page 3 of this document?**
5 A Refuse to answer.
6 **Q Okay. Does paragraph 4 on page 3 state --**
7 **MR. GANT: I object.**
8 BY MR. JOHNSON:
9 **Q -- and I quote --**
10 MR. JOHNSON: You cannot prevent me from
11 asking questions. If you think you can, Attorney
12 Grant -- Gant, I invite you to get the Court on
13 the phone. She may be available. But you cannot
14 tell me I cannot ask questions. You can tell him
15 not to answer, but I can ask questions.
16 MR. GANT: Take a second break -- can we
17 take a second break, please, Mr. Johnson?
18 THE WITNESS: May we continue? Because I
19 do want to get this over. I don't need to take a
20 break.
21 MR. GANT: Are we going to go another hour,
22 30 minutes?
23 THE WITNESS: Take all day.
24 MR. JOHNSON: All day, and maybe beyond
25 that.

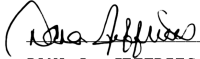
Page 150

1 THE WITNESS: That's fine.
2 MR. JOHNSON: I've got -- I've got a whole
3 bunch of questions.
4 MR. GANT: Can we do -- it's about 12:16.
5 MR. JOHNSON: Yeah, let's take a break
6 then.
7 MR. GANT: Take a lunch break.
8 MR. JOHNSON: Sure, we can take a lunch
9 break.
10 THE WITNESS: I want to say this. It's an
11 imposition on my time --
12 THE VIDEOGRAPHER: We're still on -- we're
13 still on the record.
14 THE STENOGRAPHER: Y'all are talking at the
15 same time. I'm not getting anything.
16 THE WITNESS: I just want you to know. I
17 know we're still on the record.
18 As the witness being deposed, I hate the
19 fact we're getting these breaks and we're getting
20 in these extensive arguments. I want to get this
21 done, and I'm here to answer questions, and at a
22 certain time I'm going home. And I want you to
23 be clear.
24 MR. JOHNSON: Okay. All right.
25 THE VIDEOGRAPHER: If it's good for


Page 151

1 everyone, the time is 12:17. We're now off the
2 record.
3 (Recess from 12:17 p.m. until 1:22 p.m.
4 Deposition continued in Volume 2.)
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Page 152

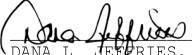
1 CERTIFICATE OF OATH
2
3
4 STATE OF FLORIDA)
5 COUNTY OF ESCAMBIA)
6
7 I, the undersigned authority, certify that
8 WILLIE GREEN, personally appeared before me and was
9 duly sworn on the 28th day of June, 2023.
10 Signed this 24th day of July, 2023.
11
12
13 
14 DANA L. JEFFRIES, RPR
15 Notary Public - State of Florida
16 My Commission No. HH 385332
17 My Commission Expires: June 25, 2027
18
19
20
21
22
23
24
25

Page 153

1 CERTIFICATE OF REPORTER
2
3 STATE OF FLORIDA)
4 COUNTY OF ESCAMBIA)
5
6
7
8 I, DANA L. JEFFRIES, Registered
9 Professional Reporter, certify that I was authorized
10 to and did stenographically report the video-recorded
11 deposition of WILLIE GREEN, Volume 1, pages 1 through
12 151; that a review of the transcript was requested;
13 and that the transcript is a true and complete record
14 of my stenographic notes.
15 I further certify that I am not a relative,
16 employee, attorney, or counsel of any of the parties,
17 nor am I a relative or employee of any of the parties'
18 attorney or counsel connected with the action, nor am
19 I financially interested in the action.
20
21 DATED the 24th day of July, 2023.
22
23 
24 DANA L. JEFFRIES, RPR
25

Willie Green
June 28, 2023

Page 154

1 07/25/2023
2 Dear Bishop Green,
3 grekak23@gmail.com
4 WITNESS: WILLIE GREEN
5 RE: COGIC vs. Watts
6 CASE NO: 2021-CA-002561
7 Deposition on June 28, 2023
8 The above-stated transcript is now available and
9 requires signature by the witness.
10
11 Please e-mail fl.production@lexitaslegal.com for
12 access to a read-only PDF transcript and PDF-fillable
13 errata sheet via computer or use the errata sheet that
14 is located at the back of the transcript.
15 Once completed, please print, sign and return to the
16 e-mail address listed below for distribution to all
17 parties.
18 If the transcript is not read within a reasonable
19 amount of time, the original transcript may be filed
20 with the Clerk of the Court.
21 If the witness prefers not to read the transcript,
22 then the witness needs to sign on the line at the
23 bottom of the letter and return to the e-mail address
24 listed below.
25
26 If you need any needed assistance, don't hesitate to
27 contact Lexitas at 888-811-3408.
28
29 Very truly yours,
30
31 
32 DANA L. JEFFRIES, RPR
33 Lexitas
34 fl.production@lexitaslegal.com
35 I do hereby waive my signature.
36
37
38 WILLIE GREEN
39 Job No: 317055

Page 155

1 ERRATA SHEET
2 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
3 IN RE: COGIC vs. WATTS, Volume 1
4 CASE NO. 2021-CA-002561
5 WITNESS: WILLIE GREEN TAKEN: 06/28/2023
6 PAGE LINE CHANGE REASON FOR CHANGE
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 Under penalties of perjury, I declare that I have read
23 the foregoing document and that the facts stated in it
24 are true.
25 _____
26 Date WILLIE GREEN
27
28 JOB NO: 317055