

IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY FLORIDA

WILLIE C. GREEN,

CASE NO.: 21CA 2710
DIVISION: K

Plaintiffs

vs

CHRISTOPHER R. JOHNSON,

KENNETH WATTS, INDIVIDUALLY AND
AS CHAIRMAN OF BOARD
OF TRUSTEES/DIRECTORS,
WESTSIDE MINISTRY, INC.,

WESTSIDE MINISTRY, INC,

COSTON HUFF, JR. INDIVIDUALLY AND
AS TRUSTEE/DIRECTOR WESTSIDE
MINISTRY, INC

MOSES TYSON, JR.

Defendants

PAM CHILDERS
CLERK & CONTROLLER
FILED
2023 MAY 15 A 10:20
ESCAMBIA COUNTY, FL

SECOND AMENDED COMPLAINT FOR DEFAMATION

Comes now, Plaintiff, Willie C. Green, and hereby sues Christopher R. Johnson, Kenneth Watts, Westside Ministry, INC., Coston Huff, Jr., Moses Tyson, Jr. herein referred to collectively as "DEFENDANTS" for Defamation for making false, damaging statements, and as grounds therefore alleges as follows:

PARTIES

PLAINTIFFS

1. Willie C. Green, hereinafter "GREEN" pastors a local church in Escambia County and is a Bishop in the Church of God in Christ, Inc.

DEFENDANTS

2. Christopher R. Johnson is a local attorney, located at 7 North Coyle Street, Pensacola, Florida, 32502.
3. Kenneth Watts, a resident of Escambia County, Florida, lives at 5123 Crestwood Road, Pensacola, FL 32503, serves as Pastor and Chairman of the Board of Trustees/Directors of Westside Ministry, INC..
4. Westside Ministry, Inc, a Florida not for profit corporation is located in Escambia County at 51 Marshall Lane, Pensacola, FL 32505.
5. Coston Huff, Jr., Westside Ministry, Inc. Trustee/Director, is a resident of Escambia County who lives at 1230 West Yonge Street, Pensacola, FL 32501.
6. Moses Tyson, Jr. a Pastor whose business address is 1660 McAllister St. San Francisco, CA and who describes himself as working with WESTSIDE.

JURISDICTION AND VENUE

7. Venue of this proceeding is in this county because this is the county where the defamation occurred and both Plaintiff and Defendants, reside in Escambia County, Florida or do business in Escambia County, Florida except for Moses Tyson, Jr.
8. The Circuit Court is the appropriate Court for the matters at hand. The requested relief is in excess of \$30,000 dollars not including Cost and Fees.

FACTS RELEVANT TO ALL COUNTS

9. Willie C. Green serves as Jurisdictional Bishop in The Church of God in Christ.
10. Jurisdictional Bishops have general supervision and oversight of all Church of God in Christ churches and credential holders located in their jurisdictions and may make periodic visits to those churches.

11. Westside Ministry, INC, formerly known as West Side Church of God in Christ, was a long-time member church in the jurisdiction where "GREEN serves as Jurisdictional Bishop.

12. Kenneth Watts was a credential holder in The Church of God in Christ and served as a Pastor and leader in the jurisdiction where GREEN serves as Jurisdictional Bishop.

13. Coston Huff, Jr. has been a long-time member of the jurisdiction where GREEN serves as Jurisdictional Bishop.

14. Moses Tyson, Jr. is a Pastor who frequently post emails on the internet and sends them across the country.

15. On or about April 1, 2021, GREEN notified WATTS, WESTSIDE, HUFF, and members that GREEN would visit WESTSIDE on April 18, 2021.

16. On or about April 17, 2021, GREEN called WATTS to remind him that GREEN would be visiting WESTSIDE on April 18, 2021. The message was received and relayed by First Lady Watts.

17. On or about April 18, GREEN arrived at WESTSIDE accompanied by his Adjutant, Bryan Carpenter.

18. Upon entering church, GREEN was invited up to the pulpit but decided to sit in the back of the church to avoid interrupting service. Green quietly observed the service.

19. Once WATTS dismissed the service, GREEN directed his Adjutant to ask WATTS if GREEN and WATTS could talk.

20. GREEN further asked if he and WATTS could go into WATTS' office and talk. When WATTS said no, GREEN quietly walked out of the building to his vehicle and left.

21. GREEN did not interrupt or disturb the service in any way nor did GREEN conduct himself in any manner that caused a disturbance or was unbecoming.

22. On or about July 30, 2021, GREEN sent a letter to Pastor Kenneth Watts and WESTSIDE, notifying them that GREEN would be meeting with all members of WESTSIDE at 3:00 PM on Sunday, August 1, 2021.

23. During the 11:00 AM service on August 1, 2021, WATTS announced that he was cancelling the 3:00 PM service. He did not notify GREEN that he was cancelling the 3:00PM service.

24. On or about August 1, 2021, GREEN arrived at both WESTSIDE locations to find the buildings locked. GREEN prayed and shared scriptures outside the facility with those who met GREEN there and quietly left.

25. GREEN did not interrupt or disturb the service in any way nor did GREEN conduct himself in any manner that caused a disturbance or that was unbecoming.

26. On or about August 29, 2021, GREEN entered WESTSIDE while the service was in progress, and quietly took a seat in the audience.

27. As WATTS was about to give the benediction for the service, he asked all visitors to stand.

28. When GREEN stood as a visitor, WATTS responded by saying, "OH, Bishop Green, I didn't know you were here. Church let's give Bishop Green a hand." Upon WATTS' request, the church gave a loud round of applause for GREEN.

29. Upon hearing WATTS' response and the applause, GREEN gave thanks and told WATTS that he had written to him on several occasions and had tried to meet with him without success. GREEN asked if the two of them could go into WATTS' office and talk.

30. WATTS declined the offer to meet, gave the benediction and dismissed the service.

31. Upon the benediction, GREEN left the service, cordially greeting those who greeted him.

32. GREEN did not interrupt or disturb the service in any way nor did GREEN conduct himself in any manner that caused a disturbance or was unbecoming.

33. On or about August 29, 2021, WATTS, HUFF, and other members of WESTSIDE communicated to other third parties that during the service on August 29, 2021 that among other things, (These are included as examples only):

a. Bishop Green showed out at Westside today.

b. Bishop Green disrupted the service at Westside.

c. Bishop Green was put out of Westside because he disrupted the service

34. On or about August 29, 2021 Coston Huff told a third party that Bishop Green was so disruptive at Westside today that he had to be put out of Westside or something to the same effect.

35. The statements are false, malicious, and intended by the DEFENDANTS to damage GREEN. These statements are given as examples only and are not intended to be a complete list.

36. On or about September 8, 2021, JOHNSON, WATTS, HUFF, and WESTSIDE composed, published, and sent a letter to others that stated among other things:

a. Bishop Green and his associates have appeared at the Ministry's services and caused disturbances on at least two occasions.

b. Anyone (referring to GREEN) who willfully interrupts or disturbs any assembly or people met for worship of God (or for any lawful purpose) commits a second degree misdemeanor.

c. We understand that Bishop Green is unhappy.

37. The statements are false, malicious, and intended by the DEFENDANTS to damage GREEN by imputing to him a crime, immorality and/or disruptive conduct.

38. On or about November 28, 2021 WATTS and other members of Westside stated on Facebook that, "He (Bishop Willie Green) is trying to steal a church that does not belong to him."

39. On or about November 28, 2021 WATTS and other members of Westside posted on FACEBOOK, "He (Bishop Willie Green) is trying to steal a church that does not belong to him."

40. On or about November 29, 2021 WATTS made a statement on Facebook that Bishop Green was trying to steal a church that does not belong to him.

41. The statements were published to third parties.

42. The statements are false, malicious, defamatory, and intended to damage GREEN.

43. On or about November/December 2021 members of WESTSIDE including Trustee Board members, marched on a street in Pensacola, shouting, holding a sign that read, "Help us STOP Bishop Willie C. Green, Church of God in Christ Agent from STEALING churches."

44. On or about November/December 2021 WESTSIDE posted a Petition for Help that read, "Help us STOP Bishop Willie C. Green, Church of God in Christ agent from STEALING churches", with a note that read "24 have signed. Let's get to 100."

45. On various date, Moses Tyson, Jr. made several false, defamatory, and malicious post in emails regarding Bishop Green in reference to Watts/Westside. The following statements are given as examples and do not include the complete list:

a. May 12, 2022, Tyson accuses GREEN of “Tyranny against the local Congregation (Westside)” and “Shakedown” or something to the same effect.

b. June 18, 2022 Tyson accuses GREEN of “Abusive Behavior”.

c. October 8, 2022 Tyson accuses GREEN of “Shysterism.”

d. March 14, 2023 Tyson accuses GREEN of being the “Front Man in an effort to STEAL PROPERTY”.

e. May 6, 2023, Tyson calls Bishop Green A Professional Tyrant.

f. April 12, 2023, Tyson accuses GREEN of “Trying to get the Court’s assistance by using FRAUD”.

46. April 2023 WESTSIDE, through its “Board of Trustees” sent a document to Leaders of GREEN’S church that contains a statement that says, “Respondent (GREEN) is actively engaged in willful crimes against justice, including perjury, perverting the course of justice, tampering with evidence, coercion, embezzlement, property theft, and organized fraud.”

47. Moses Tyson, Jr. has made the same or similar statements as the ones listed above and forwarded them across the internet.

48. The statements are false, malicious, defamatory, and intended to damage GREEN.

**COUNT 1
SLANDER/SLANDER PER SE**

49. Plaintiff incorporates by reference all allegations contained in paragraphs 1-48.

50. DEFENDANTS made statements about PLAINTIFF GREEN that were false and defamatory.

51. DEFENDANTS published/communicated these false statements to third parties.

52. DEFENDANTS knew that such false statements would likely result in substantial defamation and damages to Plaintiff GREEN as a person, Bishop and Minister of the Gospel.

53. DEFENDANTS' false, defamatory statements imputes to PLAINTIFF GREEN conduct, characteristics, morals, crimes, and/or conditions that are incompatible with PLAINTIFF GREEN'S profession as a Bishop and Minister of the Gospel.

54. DEFENDANT'S false, defamatory, and malicious statements negatively impact PLAINTIFF GREEN'S trustworthiness and character, subjecting him to distrust, ridicule, contempt, and/or disgrace, along with other damages.

**COUNT 2
LIBEL/LIBEL PER SE**

55. Plaintiff incorporates by reference all allegations contained in paragraphs 49-54.

56. On or about September 8, 2021 DEFENDANTS published a letter to third parties that accused PLAINTIFF GREEN of having committed acts that are criminal, immoral, disruptive, and defamatory. These statements were made with malice and include the following:

a. Bishop Green and his associates have appeared at the Ministry's services and caused disturbances on at least two occasions.

b. Anyone (referring to GREEN) who willfully interrupts or disturbs any assembly or people met for worship of God (or for any lawful purpose) commits a second degree misdemeanor.

c. We understand that Bishop Green is unhappy.

57. On or about November 28, 2021 WATTSWESTSIDE Posted on Facebook a statement that accused GREEN of trying to steal a church.

58. April 2023 WESTSIDE, through its "Board of Trustees" sent a document to Leaders of GREEN'S church that contains a statement that says, "Respondent (GREEN) is actively engaged in willful crimes against justice, including perjury, perverting the course of justice, tampering with evidence, coercion, embezzlement, property theft, and organized fraud."

59. On about May 2022 through May 6, 2023, Defendant Moses Tyson, Jr. has made posts in emails to other third parties falsely accusing GREEN of committing crimes, including but not limited to:

- a. Tyranny.
- b. Shakedown.
- c. Abusive Behavior.
- d. Shysterism.
- e. Front man for Stealing Property.
- f. Fraud.

60. PLAINTIFF GREEN has been damaged by these statements.

61. These statements were published with malice and/or a reckless disregard for the truth.

Prayer For Relief


WHEREFORE, PLAINTIFF GREEN prays for a judgment against DEFENDANTS, awarding all damages, cost, fees as allowed by law and such other relief as this Court deems necessary and proper to complete justice.

Prayer For Jury Trial

PLAINTIFF GREEN prays for a Jury Trial on all issues so triable

DATED this 15th day of May 2023

Respectfully Submitted

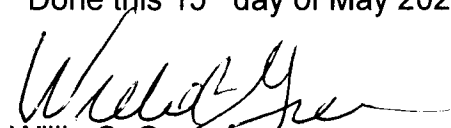

Willie C. Green
296 Bradwell Road,
Quincy, FL 32351

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been filed with the clerk of court and a copy has been mailed to DEFENDANTS and DEFENDANTS' attorney at:

Trinidad Law Group, 7 North Coyle Street, Pensacola, Florida, 32502

Done this 15th day of May 2023 By:


Willie C. Green

296 Bradwell Road

Quincy, Florida 32351