

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

WILLIE C. GREEN,

Plaintiff

vs

FELICIA WATTS-KIDD,

Defendant

CASE NO.: 2024 CA 000382

PAM CHILDERS
CLERK & COMPTROLLER
FILED
2024 MAR 21 P 1:11
ESCAMBIA COUNTY, FL

COMPLAINT FOR DEFAMATION

Comes now, PLAINTIFF, Willie C. Green, and hereby sues FELICIA WATTS-KIDD herein referred to as "DEFENDANT" for Defamation for making false, damaging statements, against PLAINTIFF and as grounds therefore alleges as follows:

PARTIES

PLAINTIFF

1. Willie C. Green, hereinafter "GREEN" or PLAINTIFF lives at 296 Bradwell Road in Quincy, Florida and Pastors a church in Escambia County, Florida.

DEFENDANT

2. Felicia Watts-Kidd, Hereafter "DEFENDANT" whose published address is 51 Marshall Lane, Pensacola, FL 32505 and 5123 Crestwood RD Pensacola, FL, 32503.

3 DEFENDANT'S attorney is Christopher Johnson whose address is 7 North Coyle Street, Pensacola, FL 32502.

JURISDICTION AND VENUE

4. Venue of this proceeding is in Escambia County, FL because this is the county where

the defamation occurred and the DEFENDANT resides.

5. The Circuit Court is the appropriate Court for the matters at hand. The requested relief is in excess of \$50,000 dollars not including Cost and Fees.

FACTS RELEVANT TO ALL COUNTS

6. PLAINTIFF serves as Jurisdictional Bishop in The Church of God in Christ.

7. DEFENDANT is a member of a local church in Pensacola, FL.

8. On or about February 2024, DEFENDANT drafted an "Official Complaint Cover Letter" addressed to the Office of Professional Responsibility, 445 Minnesota Street, Suite, 2400, St. Paul, MN 55101-2139, which handles complaints against attorneys barred in Minnesota. herein referred to as DRAFT. **SEE EXHIBIT ONE.**

9. PLAINTIFF is not an attorney barred in Minnesota.

10. The DRAFT was dated February 26, 2024 and had the letters DRAFT written across each page.

11. The DRAFT was directly cc'd to Keith Ellison, Minnesota Attorney General and Ashley Moody, Florida Attorney General.

12. The DRAFT was attached to an email dated February 19, 2024, 12:21 a.m. and addressed to approximately 100 email accounts of Third Parties.

13. Some of the Third Parties included in the February 19, 2024 email were Moses Tyson, Jr., De'Mario Jives, Bishop Drew Sheard, Bishop Thuston, Jon Saffold, Kenneth Faison, Ron Stidham, Damell Harrison, Destry Bell.

14. In one part of the February 19, 2024 Email, Moses Tyson writes, "Dear Ms. Felicia...Please get the DOCUMENTS TO BE FILED AGAINST SAFFOLD for his lies TO THE COURT, attached with the Bar Association as well as any criminal forums".

15. The DRAFT was also attached to emails dated March 2024 addressed to approximately 100 email accounts of Third Parties.

16. Some of the Third Parties included in the March , 2024 emails were Moses Tyson, Jr., De'Mario Jives, Bishop Drew Sheard, Bishop Thuston, Jon Saffold, Kenneth Faison, Ron Stidham, Damell Harrison, Destry Bell.

17.The DRAFT contained the statement, "Saffold's actions in preparing and supplying this fraudulent affidavit, which was designed to support the unlawful actions of one Mr. Willie Green, who sought to dispossess Pastor Kenneth Watts-a distinguished war veteran and the rightful owner- of his property rights" or something to the same effect.

18. The DRAFT contained the statement, "Attorney Saffold made numerous deceptive declarations under oath with the intent to aid Mr. Green in stealing control of real property" or something to the same effect.

19. The DRAFT contained the statement, "The property in question is valued at approximately 1.6 million dollars."

20. On or about March 2, 2024, PLAINTIFF sent a letter to DEFENDANT and no other party seeking an apology stating , "requesting that you immediately apologize to me and send out a retraction to all those that you included in your emails, notifying them that the statements that you wrote about me are false."

21. DEFENDANT did not respond to PLAINTIFF as requested.

22. On or about March 6, 2024, PLAINTIFF received an email, on behalf of DEFENDANT from Moses Tyson, Jr., copied to other third parties, attaching PLAINTIFF'S March 2, 2024 letter of request to DEFENDANT. In his response on behalf of DEFENDANT, Mr. Tyson states, " Bishop Green, YOUR LETTER is just plain NUTS in my opinion. Before we take back

ANYTHING we have said about your fraudulent ACTIONS since April 6th 2022, I WILL ADD MORE T*O ITI"

23. On or about March 6, 2024, PLAINTIFF received a letter via email from DEFENDANT'S attorney, Christopher Johnson, regarding PLAINTIFF'S March 2, 2024 request. Attorney Johnson notified PLAINTIFF that he represents DEFENDANT and that , "all communications to the defendants should be directed solely to me (Attorney Johnson)".

24. As of today's date, DEFENDANT has not apologized or retracted any of DEFENDANT'S statements made in DRAFT against PLAINTIFF.

ADDITIONAL STATEMENTS

25. On or about August, 2023, DEFENDANT wrote to Elder Stidham, forwarded to Third Parties including Moses Tyson, Jr., Bishop Sheard, Bishop Richardson, Bishop Dixon, "We can prove that this is a scam and that the office of the General Secretary, Corporate Attorney (Saffold) and COGIC Agents (bishops) are all involved in an internal scam to steal control of our property...Honestly, I'm just waiting on the depositions to be completed so that I can send the letters off and report COGIC, Green & Saffold to the State Attorney." SEE EXHIBIT TWO.

26. On or about February 13, 2024, DEFENDANT, writing to Moses Tyson, Jr, copied to others including Bishop Sheard, Bishop Galbrath, Kenneth Faison, Bishop Dixon, writes, "I will also forward the complaints to Tennessee and Florida State Attorney General's. Provided that he perjured himself in Florida in support of Green's real estate scam and Tenn because that is where COGIC is incorporated. Pastor Tyson, when I fill this out I'm

sending it...**One of these COGIC crooks needs to go to jail and I wanted it to be Green because he is a crazy lunatic wearing a purple robe using the name of God and COGIC to still property, but I will settle for Saffold.**"

COUNT ONE-DEFAMATION, LIBEL

27. Plaintiff incorporates by reference all allegations contained in paragraphs 1-26.

28. The statement made by the DEFENDANT, "Saffold's actions in preparing and supplying this fraudulent affidavit, which was designed to support the unlawful actions of one Mr. Willie Green, who sought to dispossess Pastor Kenneth Watts-a distinguished war veteran and the rightful owner- of his property rights.", accuses the PLAINTIFF of unlawful actions (crimes).

29. The statement by DEFENDANT accuses PLAINTIFF of committing fraud.

30. The statement made by DEFENDANT, "Attorney Saffold made numerous deceptive declarations under oath with the intent to aid Mr. Green in stealing control of real property", accuses PLAINTIFF of being part of a conspiracy to commit crimes.

31. The above statement by the DEFENDANT accuses PLAINTIFF of Property Theft or attempted property theft by stealing or attempting to steal property owned by DEFENDANT'S father, Kenneth Watts.

32. The statement made by DEFENDANT, "We can prove that this is a scam and that the office of the General Secretary, Corporate Attorney (Saffold) and COGIC Agents (bishops) **are all involved in an internal scam to steal control of our property...**Honestly, I'm just waiting on the depositions to be completed so that I can send the letters off and report COGIC, **Green & Saffold** to the State Attorney", **accuses PLAINTIFF of being part of a scam (conspiracy) to steal property.**

33. The statement made by the DEFENDANT, **“One of these COGIC crooks needs to go to jail and I wanted it to be Green because he is a crazy lunatic wearing a purple robe using the name of God and COGIC to still property”** accuses PLAINTIFF of **being a crook, crazy, lunatic who still (steals) property and needs to go to jail.**

34..The statements were published to third parties.

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

COUNT TWO-LIBEL PER SE

36. Plaintiff incorporates by reference all allegations contained in paragraphs 27-35.

37. On or about February 2024 and March 2024, DEFENDANT wrote and published to third parties the following statements about the PLAINTIFF:

a. “Saffold’s actions in preparing and supplying this fraudulent affidavit, which was designed to support the unlawful actions of one Mr. Willie Green, who sought to dispossess Pastor Kenneth Watts—a distinguished war veteran and the rightful owner- of his property rights.”

b. “Attorney Saffold made numerous deceptive declarations under oath with the intent to aid Mr. Green in stealing control of real property.”

c. “The property in question is valued at approximately 1.6 million dollars.”

38. On or about August 6, 2023, DEFENDANT wrote and published, **“COGIC Agents (bishops) are all involved in an internal scam to steal control of our property...Honestly, I’m just waiting on the depositions to be completed so that I can send the letters off and report COGIC, Green & Saffold to the State Attorney”**

39. On February 13, 2024, DEFENDANT wrote and published, **One of these COGIC crooks needs to go to jail and I wanted it to be Green because he is a crazy lunatic wearing a purple robe using the name of God and COGIC to still property**

40 DEFENDANT'S published statements to third parties, accusing PLAINTIFF GREEN of having committed felonious acts that are criminal, immoral, disruptive, and defamatory.

41. DEFENDANT knew or should have known that her statements about the PLAINTIFF were false.

MALICE

42. The DEFENDANT made the above defamatory statements about the PLAINTIFF with malice, negligence, and/or a reckless disregard for the truth.

43. The DEFENDANT made the defamatory statements about the PLAINTIFF because DEFENDANT is trying to gain an advantage against PLAINTIFF in other pending COMPLAINTS that both DEFENDANT and PLAINTIFF are parties to.

44. The DEFENDANT made the defamatory statements about the PLAINTIFF because DEFENDANT wants to have PLAINTIFF arrested on false charges that would give DEFENDANT further advantage in pending civil and administrative Complaints.

DAMAGES

45. Plaintiff incorporates by reference all allegations contained in paragraphs 36-44.

44. PLAINTIFF GREEN has been damaged by DEFENDANT'S statements.

45. DEFENDANT'S statements about the PLAINTIFF to Third Parties attribute to the PLAINTIFF conduct, characteristics, and conditions that are incompatible with PLAINTIFF'S duties and profession as a minister.

46. DEFENDANT'S statements about the PLAINTIFF to Third Parties accuse the PLAINTIFF of committing felonious crimes and have subjected the PLAINTIFF to hatred, distrust, and/or ridicule.

47. DEFENDANT'S statements about the PLAINTIFF to Third Parties have caused damages to PLAINTIFF'S reputation and good name.

48. DEFENDANT'S statements about the PLAINTIFF to Third Parties have caused the PLAINTIFF to suffer humiliation, embarrassment and stress.

Prayer For Relief

WHEREFORE, PLAINTIFF GREEN prays for a judgment against DEFENDANT, awarding PLAINTIFF compensatory damages, including consequential and incidental damages, awarding 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 21st day of March 2024 and Respectfully Submitted

BY:



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

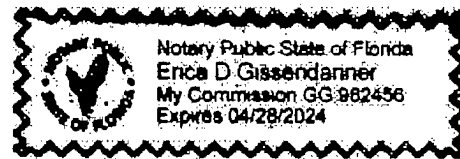
Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true to the best of my knowledge and belief.

Willie C. Green

Willie C. Green
296 Bradwell Road
Quincy, FL 32351

STATE OF FLORIDA
COUNTY OF BAY

The Foregoing instrument was acknowledged before me this 21st day of March 2024, by Willie C. Green, who is personally known by me ___ or who produced Driver's License as identification.



Erica D. Gissendanner

Notary Public, State of Florida

Felicia Kidd
Trustee, Westside Ministry, Inc.
51 Marshall Lane
Pensacola, Florida
(850) 281-7519
drfeliciakidd81@gmail.com

Exhibit ONE

February 26, 2024

Office of Lawyer Professional Responsibility
445 Minnesota Street, Suite 2400
St. Paul, MN 55101-2139
(651) 296-3952
<http://lprb.mncourts.gov>

To Whom It May Concern:

I am writing to express my profound concerns regarding the professional conduct of Attorney Jonathan Saffold, who currently holds a professorship at the University of Minnesota and is licensed to practice law in Minnesota. His involvement in certain activities has raised questions about his ethical integrity, particularly in relation to a corporate fraud case in which he was implicated.

I want to bring to your attention the nature of Mr. Saffold's alleged involvement in fraudulent and dishonorable conduct within the legal system, which significantly undermines his credibility and raises serious questions about his adherence to the professional code of conduct. A deceptive affidavit discovered within a Florida court's jurisdiction is not a trivial infraction, but rather a severe violation of his fiduciary duty to the judicial system. Furthermore, I must draw your attention to Mr. Saffold's actions in preparing and supplying this fraudulent affidavit, which was designed to support the unlawful actions of one Mr. Willie Green, who sought to dispossess Pastor Kenneth Watts—a distinguished War Veteran and the rightful owner—of his property rights. Attorney Saffold made numerous deceptive declarations under oath, with the intent to aid Mr. Green in stealing control of real property. The property in question is valued at approximately 1.6 million dollars. Attorney Saffold's actions are a deliberate disregard for legal norms, and Pastor Watts' rights. His creation of fictitious statements and manipulation of facts submitted to a Florida tribunal not only erodes his credibility but also demonstrates a profound disrespect for the sanctity of legal procedures.

The accusation of perjury against Mr. Saffold further exacerbates his problematic standing. As an officer of the court, unwavering commitment to truth and justice is expected. The deliberate falsehoods sworn under oath constitute a breach of his duty and are symbolic of a deeper erosion of trust between the law, its practitioners, and the public whom they serve.

Official Complaint
Cover Letter

It is deeply disheartening to encounter instances of misconduct in the legal profession. Rather than upholding the sanctity of the law, Attorney Saffold has exploited his position and authority to mishandle a civil case in Florida, abuse the court process, and infringe upon the constitutional rights of citizens, moral turpitude, and concealment of material facts. His actions not only tarnish the image of the legal profession but also undermine the very foundation of the judicial system. It is quite evident that Attorney Saffold has misused his Minnesota law license to manipulate the judicial system in Florida, misguide the Florida court and assist the Church of God in Christ, Inc. (COGIC) in a fraudulent real estate scheme. Attorney Saffold's assertions in his affidavit about COGIC's ecclesiastical procedures and his jurisdiction to preside over such matters are baseless and absurd since he has no ecclesiastical authority. It is evident that his intentions were solely to deceive the Florida court.

In light of these serious allegations, it is imperative that such transgressions be dealt with promptly and decisively to uphold the highest standards of justice within the judicial system and to safeguard public welfare.

I am confident that the appropriate actions will be taken to address the dishonest and unethical actions of Attorney Saffold. I strongly advocate for immediate disbarment—a dismissal that would send a clear message regarding the collective intolerance for such transgressions that erode public trust in our legal profession while safeguarding public interest.

Enclosed is a detailed complaint, supporting exhibits, and video evidence outlining my formal grievances against Attorney Saffold.

Your prompt attention to this critical matter is greatly appreciated as you strive to uphold the highest standards of justice within our judicial framework.

Respectfully submitted,

Felicia Kidd
Trustee, Westside Ministry, Inc.

Cc: Keith Ellison _ Minnesota Attorney General
Ashley Moody _ Florida Attorney General

Official Complaint
Cover Letter
2 of 2



Exhibit TWO

(no subject)

1 message

8505564123@vzwplx.com <8505564123@vzwplx.com>

Sun, Aug 6, 2023 at 11:50 PM

To: grekak23@gmail.com

Hello Bishop Richardson and Bishop Dixon....plz see note from Ms Felcia to an Elder.
I agreed to meet with saffold per yr req after my deposition. Why this below...

Fwd:

Good morning,

So I gave our conversation some deep thought and I have decided that I'm not going to discuss it with the board. I TRUST YOU, but I don't trust Saffold at all. He is dishonest and has fully implemented himself into what I think is a corporate crime. I am going to the state attorney as soon as we finish getting the depositions. I've already written the letters to the Governors of Florida, Michigan, Tennessee, Minnesota, and Wisconsin. I have written letters to the same states' Attorney Generals, and State/District Attorneys. And I've started the letter to my state representatives as well. We can prove that this is a scam and that the office of the General Secretary, Corporate Attorney (Saffold), and COGIC Agents (bishops) are all involved in an internal scam to steal control of our property by misconstruing the law and lying to the court. Honestly, I'm just waiting on the depositions

to

be completed so that I can send the letters off and report COGIC, Green, & Saffold to the State Attorney.... She will advise what to do from there.

I hold no malice in my heart nor do I desire harm to befall any; however, I don't trust any of them...

Plus, Saffold doesn't have the authority to let us out of the national church anyway. According to the Constitution, Charter, and Chairman of the GA, we never left COGIC so we need not make any deals. Elder Saffold can talk to Attorney Johnson if he wants, but I cannot take anything from him to my church family. We trusted him once... You remember that saying: Fool me once shame on you, fool me twice shame on me.

Elder Stidham, I am without doubt that God has our back, and that we are victorious. We are going to continue trusting God.... Look at how He has been working it out for us thus far.

I appreciate you!!!!