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Pastor Earl H. Williams  
418 Odis Cooper Jr. Avenue  
Kirbyville, Texas 75956  
(409) 363-2979  
earlwilliams629@gmail.com

November 29, 2023

Bishop Joel H. Lyle Jr.  
General Secretary  
Church of God in Christ, Inc.  
930 Mason Street  
Memphis, Tennessee 38126  
jlyles@cogic.org

Bishop Albert Galbraith  
Chairman, Board of Bishops  
Church of God in Christ, Inc.  
3700 Plymouth Drive  
North Highland, CA 95660  
albertgalbraith@comf5.com

Bishop Roy Dixon  
Chairman B. O. B. Grievance Committee  
Church of God in Christ, Inc.  
9341 Crest Drive  
Spring Valley, California 91977  
bishoproydixon.4th@gmail.com

Bishop Adrian D. Williams  
Secretary, Board of Bishops  
Church of God in Christ, Inc.  
243 Smoke Rise Trace  
Peachtree City, GA 31313  
adwill7@bellsouth.net

**Via Electronic and  
First Class Mail**

Greetings,

This letter shall serve as notification, of my Petition to the Board of Bishops Judicial Committee of a complaint I am filing against Bishop Desty C. Bell, Jurisdictional Bishop of Texas Gulf Coast Ecclesiastical Jurisdiction of the Church of God in Christ.

In accordance with the Board of Bishops Rule 3, I submit the following

- As of this date, I have not retained legal counsel but I will notify Secretary Bishop Williams if and when I retain counsel.
- I hereby certify Bishop Bell has been provided a copy of the complaint with accompanying exhibits by USPS mail.
- This complaint is brought against Bishop Bell in his capacity of Jurisdictional Bishop

Sincerely,

Earl H. Williams

Encl:

CC: Bishop Destry Bell

**BOARD OF BISHOPS**  
**GRIEVANCE COMMITTEE**  
Of the  
**CHURCH OF GOD IN CHRIST, INC**

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PASTOR EARL H. WILLIAMS	§	
Complainant	§	
	§	
vs.	§	
	§	Case Number:_____
BISHOP DESTRY C. BELL, SR. ,	§	
Respondent	§	
	§	
	§	

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**Pursuant to the Official Manual; Article VIII; Section D**

**COMPLAINANTS PETITION OF OFFICIAL CHARGES**

Come Now Pastor Earl H. Williams, member and Pastor of the Kirbyville Church of God in Christ, Kirbyville, Texas, hereinafter referred to as the Complainant, and files this herein petition against Bishop Destry C. Bell, Sr, Jurisdictional Prelate of the Texas Gulf Coast Jurisdiction of the Church of God in Christ, with headquarters in Memphis Tennessee and allege and state as follows;

Bishop Destry Bell, hereinafter referred to as the Respondent, did violate the statutes of The Bible, and the rules and regulations of the Official Manual of The Church of God in Christ, Inc. as follows;

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## STATEMENT OF FACTS

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I Pastor Earl H Williams,<sup>1</sup> and the Kirbyville Church of God in Christ, alone with nine other pastors and their churches decided to resign from our positions and duties in the Texas Gulf Coast Ecclesiastical Jurisdiction ,<sup>2</sup> in order to try and form a jurisdiction in our area of Beaumont, Tx. Because driving two hours to Missouri City, TX to our jurisdictional headquarters is very taxing, staying in a motel can also be expensive, besides that most of our members don't attend most of our jurisdictional functions.

On October 10, 2023, I submitted my resignation to Bishop Destry C. Bell Sr. On October 14, 2023, I received an email from the bishop stating. That he had resumed pastoral leadership of the Kirbyville Cogic.<sup>3</sup>

In our fall assembly meeting of October 2020 Bishop Bell asked me before those who were assembled, if I would serve as the assistant district superintendent for District Superintendent Lonnie Freeman of the East Texas Fellowship District. Doctor Freeman's poor and failing health would not allow him to do all the traveling and duties that come with being a District Superintendent. I told Bishop Bell; I would gladly assist Doctor Freeman.

This is the only jurisdictional position that I held. When I resigned from the

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<sup>1</sup> Exhibit 8

<sup>2</sup> Exhibit 1

<sup>3</sup> Exhibit 2

jurisdiction, this is the position and duties I was referring to.

On October 15, 2023 I sent Bishop Bell an email and a registered letter, informing bishop that I had not resigned as pastor of the Kirbyville Cogie, but that the church and I was resigning from the Texas Gulf coast Ecclesiastical jurisdiction. I informed him that he had misinterpreted my resignation.<sup>4</sup>

I did not get any response from Bishop Bell concerning my second e-mail or the registered letter, after many failed phone calls, I was told by one of the deacons at the Kirbyville Cogie, Bishop Bell called him, and he asked bishop why he would not call Pastor Williams, bishop told the deacon that he would not call Pastor Williams, neither would he answer any call from him.

On Sunday Oct. 22, 2023, in the Sunday morning service Pastor Walter Diggles and some of his family member came to the church, he said that Bishop Bell had sent him with a letter to remove me as pastor and that he was to take charge of the Kirbyville Cogie, I immediately told him he need to leave the church, he refused to do so.

The police were called in by me to ask Pastor Diggles to leave the church for peace sake, the police officer stated that because Pastor Diggles had a letter from Bishop Bell stating that I had resigned from my church, I needed to leave the church and I did so.

The next Sunday I was told by the police department that Bishop Bell did not want me on the church grounds, if I came to the church I would be asked to leave or arrested for

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<sup>4</sup> Exhibit 3Calrification of Resignation

criminal trespassing.

After that I contacted Chairman Eaddy of Council of Pastors and Elder's, he instructed me to do all I could to contact Bishop Bell.<sup>5</sup> For approximately two weeks I attempted to make contact, with phone calls and another register letter,<sup>6</sup> but was not able to contract Bishop Bell.

After that I contacted Chairman Eaddy again. I told him I was unable to contact Bishop Bell, he asked me for all my letters, and I gave him my explanation of the matter. He went to Bishop Bell to mediate this situation, hopefully in order not to have to go into the Grievance Committee, but Bishop Bell refused mediation.

Chairman Michael Eaddy instructed me to contact the Grievance Committee and the Board of Bishop's.

The members of Kirbyville Church of God in Christ have signed a letter of support for me the appointed pastor of their church.<sup>7</sup>

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<sup>5</sup> Exhibit 5

<sup>6</sup> Exhibit 4

<sup>7</sup> Exhibit 7

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## BRIEF OF COMPLAINANTS

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### Count I

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ARTICLE VIII, §D, ¶ 1(b): MISFEASANCE, MALFEASANCE, OR NONFEASANCE IN OFFICE:

**Malfeasance:** Evil doing; ill conduct.

The commission of some act which is positively unlawful; the doing of an act which is wholly wrongful and unlawful; the doing of an act which person ought not to do at all or the unjust performance of some act which the party had no right or which he had contracted not to do. Comprehensive term including any wrongful conduct that affects, interrupts, or interferes with the performance of official duties.

*{Black's Law Dictionary—Sixth Edition}*

Respondent has attempted to remove an appointed Church of God in Christ Pastor by interpreting a resignation from *Jurisdictional* duties to include resignation from the pastorate of Kirbyville church of God in Christ.

Respondent, before witnesses on or around October 2020, had requested Complainant serve as the Assistant District Superintendent of the East Texas Fellowship District due to the health challenges of Superintendent Lonnie Freeman. I accepted; it was from this appointment I resigned on October 10, 2023.<sup>8</sup> After receiving a letter from Respondent in which he stated, “I have resumed [pastorial] leadership...”, Complainant clarified his position in a subsequent letter<sup>9</sup> stating “I did not resign as pastor of Kirbyville Church of God in Christ”.

A position in a local church is **not** a jurisdictional position.

This unlawful, unconstitutional attempt to remove a Pastor is an act of Malfeasance.

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<sup>8</sup> Exhibit 1 Jurisdictional duties resignation.

<sup>9</sup> Exhibit 3 Clarification of resignation.

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## Count II

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### **ARTICLE VIII, §D, ¶ 1(h): CONDUCT UNBECOMING A BISHOP**

The first sentence in the Constitution of the Church of God in Christ, under the heading “Declarations of Faith and Preamble”, states

“We, the members of the Church Of God In Christ, hold the Holy Scriptures as contained in the Old and New Testaments of our Bible as our rule of Faith and Practice.”

According to our rule of faith and practice, Respondent has failed to display the characteristics the Word of God (and our Constitution) demands of him.

*Now a bishop (superintendent, overseer) must give no grounds for accusation but must be above reproach, the husband of one wife, circumspect and temperate and self-controlled; [he must be] sensible and well behaved and dignified and lead an orderly (disciplined) life; [he must be] hospitable [showing love for and being a friend to the believers, especially strangers or foreigners, and be] a capable and qualified teacher, (1 Timothy 3:2, AMP)*

We are told; Learn to do good; Seek justice, Rebuke the oppressor; Defend the fatherless, Plead for the widow. “Come now, and let us reason together,” Says the LORD, ...” (*Isaiah 1:17–18a, NKJV*)

By his actions, by his refusal to have any further dialogue, Respondents shows he is unwilling to follow peace with all men and that he is not willing to reason together.

This refusal is “Conduct Unbecoming a Bishop”.

I the Complainant, Pastor Earl H. Williams, a member of the Church of God in Christ, Inc., as Complainants in the above and foregoing Petition, affirm that the statements and allegations contained therein are true, and correct on this Friday, December 01, 2023.

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Earl H. Williams  
418 Odis Cooper Jr. Avenue  
Kirbyville, Texas 75956  
(409) 363-2979  
earlwilliams629@gmail.com



Complainants

# Exhibit 1

Earl Williams, Superintendent  
Kirbyville COGIC  
418 Odis Cooper  
Kirbyville, Texas 75956

October 10, 2023

Certified Mail # 7020 1810 0001 9757 6981

Bishop Destry C. Bell

Texas Gulf Coast Ecclesiastical Jurisdiction  
3710 McHard Rd  
Missouri City, Texas, 77489

Dear Bishop Destry C. Bell,

Please accept this letter as notice of my resignation from all positions and duties in the Texas Gulf Coast Ecclesiastical Jurisdiction as of **October 10, 2023**.

I have appreciated my time here but have chosen to resign due to unduly financial burdens place on our district, church and to pursue other opportunities. Our last day affiliated with the Texas Gulf Ecclesiastical Jurisdiction will be effective immediately this day **October 10, 2023**.

Thank you for your help and guidance during our association with the Texas Gulf Coast Ecclesiastical Jurisdiction. We wish you well and much success in the future.

*Pastor Earl G. Williams*

Earl Williams , Superintendent

7020 1810 0001 9757 6981



7020 1810 0001 9757 6981  
7020 1810 0001 9757 6981

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OFFICIAL USE	
Certified Mail Fee \$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage \$	
Total Postage and Fees \$	
Sent To	Postmark Here
Street and Apt. No., or P.O. Box No.	
City, State, ZIP+4 <sup>®</sup>	
PS Form 3800, April 2015 FSN 7530-02-000-9007 See Reverse for Instructions	



# TEXAS GULF COAST ECCLESIASTICAL JURISDICTION CHURCH OF GOD IN CHRIST, INC.

Bishop Destry C. Bell, Sr.  
*Jurisdictional Prelate*

Complainants

## Exhibit 2

October 14, 2023

Elder Earl Williams  
418 Odis Cooper  
Kirbyville, Texas 75956  
[Earlwilliams629@gmail.com](mailto:Earlwilliams629@gmail.com)

Re: Acceptance of Resignation

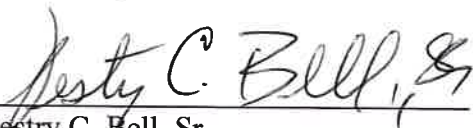
Elder Williams,

Please be advised that this communication is to **officially** acknowledge that I accept your resignation, received on October 12, 2023, from all positions and duties in the Texas Gulf Coast Ecclesiastical Jurisdiction effective October 10, 2023.

As of October 10, 2023, I resumed pastoral leadership at Kirbyville Church Of God In Christ. Please immediately give all church keys and property to Deacon Robert Booker.

Thank you for your service.

Respectfully,

  
+Destry C. Bell, Sr.

Jurisdictional Prelate, Texas Gulf Coast

**Jurisdictional Headquarters:**

3710 McHard Road • Missouri City, TX 77489 • (281) 416-8214

Complainants

## Exhibit 3

PASTOR EARL H WILLIAMS  
418 Odis Cooper Jr Ave  
Kirbyville, TX 75956

October 15, 2023

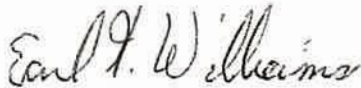
Bishop Destry C. Bell Sr  
3710 Mchard Rd.  
Missouri City, TX  
[dcbministries@sbcglobal.net](mailto:dcbministries@sbcglobal.net)

Re: In Response to Acceptance of Resignation Letter

Dear Bishop Bell:

Please be advised that this communication is to inform you that your interpretation of the letter of resignation was misinterpreted. I did not resign as pastor of the Kirbyville COGIC. The resignation involved resigning myself and the Kirbyville church from the Texas Gulf Coast Ecclesiastical Jurisdiction to pursue other opportunities. The Kirbyville COGIC was aware of my actions and it was approved. I maintain that I have not resigned from the Kirbyville COGIC. I have attempted to call you to state this information but you did not respond. Therefore, I sent this letter as correspondence to state you misunderstood the intent of the original letter. Also, you will be receiving a certified letter soon.

Sincerely,



Pastor Earl H Williams

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Missouri City, TX 77489

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10/17/2023

7022 2410 0000 7127 2502

Certified Mail Fee	\$4.35
Extra Services & Fees (check box, add fee as appropriate)	\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.66
Total Postage and Fees	\$5.01
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

## Exhibit 4

Bishop Destry C. Bell Sr  
3710 Mchard Rd.  
Missouri, Texas  
dcbministries@sbcglobal.net

Pastor Earl H. Williams

<b>U.S. Postal Service™</b> <b>CERTIFIED MAIL® RECEIPT</b> <i>Domestic Mail Only</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
MI Security City, MI 48106 <b>OFFICIAL USE</b>	
Certified Mail Fee \$ <b>44.35</b>	0656 07
Extra Services & Fees (check box, add fee as appropriate) <input type="checkbox"/> Return Receipt (hardcopy) \$ <b>3.00</b> <input type="checkbox"/> Return Receipt (electronic) \$ <b>0.00</b> <input type="checkbox"/> Certified Mail Restricted Delivery \$ <b>0.00</b> <input type="checkbox"/> Adult Signature Required \$ <b>0.00</b> <input type="checkbox"/> Adult Signature Restricted Delivery \$ <b>0.00</b>	OCT 27 2023 Postmark Here
Postage \$ <b>0.62</b>	
Total Postage and Fees \$ <b>45.01</b>	10/27/2023
Sent To Street and Apt. No., or PO Box No. City, State, ZIP+4®	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	



# Kirbyville Church of God in Christ

418 Odis Cooper Jr., Kirbyville, TX 75956 Phone 409-363-2979

Nov. 1, 2023

TO: The Council of Pastor's and Elder's COGIC

Attn: Chairman Rev. Michael Eaddy,  
930 Mason St,  
Memphis, TN 38126  
e-mail: <michaeleaddy2020@gmail.com>

Dear Chairman Eaddy;

First and foremost I want to send you greetings in the Holy Name of Jesus.

I wanted to make you aware that I myself along with my church and a group of 9 other churches in the Texas Gulf Coast Ecclesiastical Jurisdiction (TGCEJ) submitted a letter of resignation resigning from the TGCEJ to Jurisdictional Bishop Destry C. Bell, Sr., effective October 10, 2023.

Bishop Bell, on October 14, 2023, responded by e-mail to me that he had "resumed Pastoral leadership of the Kirbyville COGIC."

As Pastor of Kirbyville COGIC I responded to Bishop Bell on Oct. 15 by e-mail and registered letter informing Bishop Bell that he had misinterpreted my letter. And, I made clear to him that I had only resigned from the TGCEJ and NOT from my Pastorial leadership at Kirbyville COGIC.

After several failed attempts by phone to reach Bishop Bell I wrote another e-mail and registered letter to him reiterating my position. His response was to send Administrative Assistant Walter Diggles to take my keys and other church property but I told him I would not do that.

I submitted another e-mail and registered letter informing Bishop Bell that "We really needed to talk about this matter" but NO RESPONSE. Bishop Bell instead

circumvented me with one of my Deacons telling him, "He would not call me nor answer my calls."

Again, I reiterated to Bishop Bell that my resignation was from the TGCEJ and NOT from the Kirbyville COGIC.

Chairman Eaddy anything you can do to help mediate with me in this situation I would be greatly gratified with you advice. Hopefully it would not be necessary to refer this matter to the grievance committee or the Board of Bishops.

Chairman Eaddy, the greater majority of my congregation supports me in this endeavor, but they are hard pressed by the tactics of those who would oppose my call to continue at this post.

In the Name of Our Lord and Savior Christ Jesus I remain;

Rev. Earl Williams  
Pastor of the Kirbyville COGIC

CC: -Bishop Destry C. Bell

5 letter copies coming under separate cover.

## Exhibit 6



### *Kirbyville Police Department*

102 S. Margaret St.  
Kirbyville, TX 75956  
(409)423-6201  
(409)423-7320 Fax  
Chief Paul Brister

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To whom it may Concern,

On Sunday October 22, 2023 Sgt Josh Hancock responded to a call given him in reference to a problem at the Kirbyville Church of God in Christ located at 418 Odis Cooper in Kirbyville, Texas.

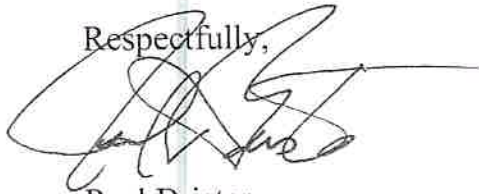
Upon arrival Sgt Hancock was presented a letter of resignation from the Church written and signed by Pastor Earl Williams. Pastor Williams said that the letter of resignation was a mistake stating that letters intent was to resign from the Texas Gulf Coast Ecclesiastic Jurisdiction under the leadership of Bishop Bell.

Sgt Hancock asked the congregation present if it was their understanding that Pastor Williams had resigned as Pastor of the Church and said that all present said that it was their understanding with the exception of one lady that said she did not understand what was going on.

Sgt Hancock asked the congregation if their wishes were that Pastor Williams leave and they stated that they did. At this time Sgt Hancock asked Pastor Williams to leave and said that he did without further incident.

It is not the position of the Kirbyville Police Dept. to decide who the Pastor of the Church should be nor do we desire that decision. Our only involvement was to answer a call that we were dispatched to and nothing further. Any further action should be made either by the membership of the Church or thru Attorneys and the proper Court Jurisdiction.

Respectfully,

A handwritten signature in black ink, appearing to read 'Paul Brister', with a large, stylized initial 'P' and 'B'.

Paul Brister



# Kirbyville Church of God in Christ

418 Odis Cooper Jr., Kirbyville, TX 75956 Phone 409-363-2979

## TO WHOM IT MAY CONCERN:

This letter is addressed to highlight the loving-kindness and support from our Pastor's Earl H. and Lady Theresa E. Williams at a time when others would attempt to subvert and undermine the already established authority present in our pulpit.

It is signed by each of the members of the Kirbyville Church of God in Christ.

Please consider this an endorsement of the qualified leadership and shepherding that our Pastor and his wife has provided since accepting the call to minister in January 2019. The world is able to see the authentic love of Christ on display in real and substantial and practical ways daily through their Pastorate.

For example:

- caring and concern for those who are facing hardship.
- providing Bible-based teaching through Sunday School, church and regular Bible studies.
- supporting the local community.

Wholeheartedly signed by the Kirbyville Church of God in Christ membership:

Herman M. Rawls

Subrella Grant

Jersey Joe Gilbert

Theresa Williams

LEONARD POWELL

Herman M. Rawls

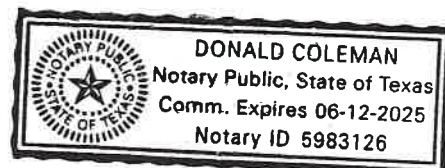
Subrella Grant

Jersey Joe Gilbert

Theresa Williams

LEONARD POWELL

"We do so declare."



# Kirbyville Church of God in Christ

418 Odis Cooper Jr., Kirbyville, TX 75956 Phone 409-363-2979

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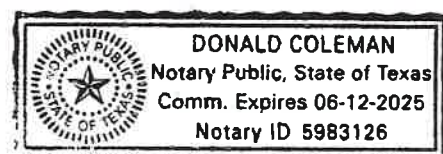
Wholeheartedly signed by the Kirbyville Church of God in Christ membership:

Print: Selena Kellum Sign: Selena Kellum

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"We do so declare."



## Notarization

State of Texas

County of Jasper

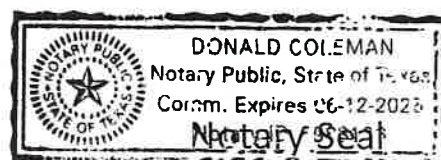
Before me Donald E Coleman, notary public, State of Texas, on this day, personally appeared TERESA E. WILLIAMS, prove to me by though Identity Card (Government ID) to be the person whose name is subscribed to the foregoing instrument and who acknowledgement to be the person whose name is subscribed on the foregoing instrument and who acknowledge to me that he/she executed the same for the purpose and consideration expressed herein

Given under my hand and seal of office this 7 Day of November 2023

Teresa Williams

Donald E Coleman

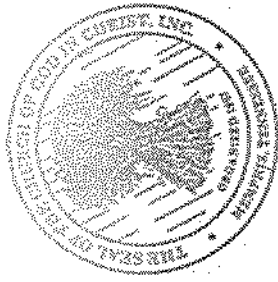
Notary Public, State of Texas



**Church Of God In Christ, Inc.**  
World Headquarters • Memphis, Tennessee, USA

Bishop C.H. Mason, Founder

**PASTOR APPOINTMENT**



By virtue of the authority in me vested, as Prelate of the \_\_\_\_\_  
Jurisdiction Church Of God In Christ, I do hereby appoint \_\_\_\_\_ to the office of Pastor of the  
\_\_\_\_\_ Church Of God In Christ.

Texas Gulf Coast

Earl H. Williams

Kirbyville

This appointment is made based on his godly life, knowledge of truth, faithfulness to God's Word and aptness to teach the same. He has been found to be sound in the doctrine, and we believe him to be anointed to teach the gospel. Therefore, we recommend him to the brethren everywhere. For cause, or violation of the Church Of God In Christ Ministerial Ethics/Policies and/or Doctrinal Standards, license may be revoked by the Jurisdictional Bishop.

Done this 19<sup>th</sup> day of January in the year of our Lord 2019

Bishop C.E. Blake, Sr.  
*Presiding Bishop*

Bishop P.A. Brooks  
*First Assistant Presiding Bishop*

Bishop J.W. Macklin  
*Second Assistant Presiding Bishop*

Bishop J. H. Lyles, Jr.  
*General Secretary*

*Thelma C. Zeller*  
Jurisdictional Bishop

*Charles D. Hill*  
Jurisdictional Secretary

Certificate No. 313-89645-38-0119cf