

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

CHURCH OF GOD IN CHRIST, INC.,
NORTHWEST FLORIDA JURISDICTION
CHURCH OF GOD IN CHRIST, INC.,
WEST SIDE CHURCH OF GOD IN
CHRIST.

CASE NO. 2021 CA 002561

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

DEFENDANTS' BRIEF IN SUPPORT OF MOTION TO DISSOLVE OR VACATE
TEMPORARY INJUNCTION AND TO DISMISS ALL REMAINING CLAIMS

COME NOW Defendants/Counter-Plaintiffs (hereafter Westside COGIC), in support of the pending Motion to Dissolve or Vacate Temporary Injunction and to Dismiss All Remaining Claims with Prejudice, and provide the following in support:

Synopsis

In 2021, Bishop Green filed the instant suit against the Defendants, on behalf of Church of God in Christ, Inc. (hereafter COGIC), and the other named Plaintiffs. At issue in the lawsuit are three parcels of real property in Escambia County, FL, to wit: 51 Marshall Lane, 2313 G. Street, and 1100 W. Yonge Street.

In February, 2022, COGIC General Counsel issued a statement on behalf of COGIC stating that Bishop Green does not have the authority to bring a lawsuit on behalf of the church. Correspondence from the Office of the General Counsel, Church of God in Christ, dated February 8, 2022 is attached hereto as Exhibit A.

In early April of 2022, the COGIC Reconciliation and Mediation Committee, chaired by Dr. Dr. Frederick D. Jenkins, issued their Report to the Presiding Bishop and General Assembly, setting forth the Committee's findings, opinions and recommendations. A complete true and correct copy of the Report of the Reconciliation and Mediation Committee is attached and fully incorporated herein as composite Exhibit B. Among other things, the Report states that Bishop Green *"did involve the Church Of God In Christ, Inc. in civil litigation without permission from the Leadership of the Church Of God In Christ, Inc. to do so...Did represent himself as an (Agent) of the church when he is, in fact, according to our Official Manual: The representative within the Ecclesiastical Jurisdiction of his assignment did not give him the power to involve the Church Of God In Christ, Inc. in any legal matters without permission to do so. In this act, he has put the church at risk."* Please see page 3, Exhibit B.

On April 6, 2022, a Joint Order of the Presiding Bishop and General Assembly was issued, stating, among other things, as follows:

Syllabus By The Court

"The jurisdiction of Civil Courts to address matters involving church affairs is limited. Neither state nor federal courts may undertake the resolution of quintessentially religious controversies, whose resolution the First Amendment to the Constitution of the United States of America commits exclusively to the highest ecclesiastical tribunals of the Church.

The Establishment Clause of the First Amendment to the Constitution of the United States of America prevents the government from appointing ministers. The Free Exercise Clause also prevents the government from interfering with the freedom of religious groups to select their own. The First Amendment permits hierarchical religious organizations to establish their own rules and regulations for internal discipline and government and to create tribunals for adjudicating disputes over such matters.

Purely theological questions and matters ecclesiastical in character must be determined by the authorities of the particular church involved according to its laws and usage.

The Church of God in Christ, Inc., is a long-established ecclesiastical organization. Numerous local churches are part of its' defined ecclesiastical hierarchical system. See *Serbian Orthodox Diocese v. Milivojevich*, 426 U.S. 696, 49 L. Ed. 2d 151, 96 S. Ct. 2372, reh. Denied 429 U.S. 873 (1976)(Supreme Court recognized that the Orthodox Church was a "hierarchical church", within a governing body, set rules of procedure, and an internal appeals procedure). The Church of God in Christ is typically organized with various pastors, District Superintendents, and Bishops. See *Church of God v. Middle City Ch. Of God*, 774 S.W.2d 950, 951 (Tenn. App. 1989).

The National Church has duly adopted a constitution, policies, procedures, by-laws, and a Judicial Code of Conduct applicable to its' members and local churches. The Pastor of the local church is responsible for ensuring local compliance with the National Churches' doctrinal and other policies and is empowered by the Jurisdictional Bishops upon appointment within their jurisdiction. See *Church of God in Christ, Inc., v. Graham*, 54 F. 3d 522, 524 (8th Cir. 1995), Part I, the Constitution, Article III, Part 2., Section D, pp 5, 9, and 11 and Section J, of the Official Manual of the Church of God in Christ.

Statement of Jurisdiction

The Official annual of the Church of God in Christ, copyright 1973, reprinted in 1991 and 1992 in Article III, Part II, Section B states:

"The General Assembly is the Supreme Legislative and judicial Authority of the Church of God in Christ. It is the only tribunal which has the power to express doctrine and creeds of the Church, and its decisions shall be binding on all members of the Church of God in Christ. "

Statement of the Case

This case arose out of a dispute between a local pastor and the Jurisdictional Bishop, without exhausting all remedies in the ecclesia, and without leave of the Church to do so, the above sited case was filed with the secular court. Upon being

made aware of the this flaw the parties petitioned the Church through the Presiding Bishop and Chief Apostle and the General Assembly to bring resolution to the above sired case and all related or associated civil actions.

A complete copy of the Joint Order is attached and fully incorporated herein as composite Exhibit C.

By correspondence dated June 7, 2022, the COGIC Office of the General Counsel issued a letter removing 1100 Yonge Street from the aforementioned Joint Order. A true and correct copy of the June 7, 2022 correspondence from the Office of the General Counsel, COGIC, is attached hereto as Exhibit D.

By correspondence dated July 6, 2022, the COGIC Office of the General Counsel issued a letter removing 2313 G Street from the aforementioned Joint Order. A true and correct copy of the July 6, 2022 correspondence from the Office of the General Counsel, COGIC, is attached hereto as Exhibit E.

In light of the above, it appears inarguable that Westside COGIC is a local COGIC Church existing within the hierarchical polity of the Church of God in Christ, Inc. (hereafter COGIC). COGIC has a written Constitution and Official Manual that set forth the relationship among the local churches and the churchwide organization. Westside COGIC is subject to the oversight and discipline of COGIC. Through its Constitution and Official Manual, COGIC has established its' rules and regulations for internal discipline and governance.

Several years ago, due to the difficult relationship between West Side COGIC and Bishop Green, the congregation of Westside COGIC attempted to disaffiliate itself with COGIC. After Westside COGIC notified Northwest Florida Jurisdiction and Bishop Willie

Green of its intention to disaffiliate. Bishop Green initiated the instant lawsuit on behalf of COGIC and NWFLJ. Though named as a Plaintiff in this case, COGIC was unaware of the lawsuit when it was initiated by Bishop Green. As set forth above, after COGIC became aware of the instant lawsuit, each of the issues raised by Plaintiff in were addressed by COGIC through the constitutional process of a meeting before COGIC's Presiding Bishop and General Assembly.

As referenced in Exhibit C, the Church of God in Christ acknowledges the issues to be *ecclesiastical* in nature; thus, such determinations are within the jurisdiction of the *ecclesiastical* body of the Church. COGIC enforces its rules and regulations for internal discipline and governance through an internal ecclesiastical process. This process, as dictated by COGIC's Constitution and Official Manual, provides a method by which COGIC congregations may resolve internal disagreements between COGIC and its local churches. The process allows for such issues to ultimately be considered and determined by the Presiding Bishop and General Assembly of COGIC. Under the process, the decision of the Presiding Bishop and General Assembly is final as to the resolution of a dispute between a local church and COGIC. The dispute as to Westside COGIC's disaffiliation was an internal church dispute subject to COGIC's internal ecclesiastical process. The COGIC constitution and Official Manual provide the steps for the local church to end its membership and affiliation with COGIC. Pursuant to the determination of the Presiding Bishop and General Assembly, Westside COGIC never properly commenced, nor completed, the disaffiliation process and therefore remains an affiliated local church. Westside COGIC is bound to follow the disaffiliation process as detailed in the COGIC constitution, and the outcome of the process is binding upon the Congregation of West Side COGIC.

The dispute between Bishop Green and Westside COGIC was escalated, in accordance with COGIC's Constitution and Official Manual, to the highest authority for final decision within the hierarchy of COGIC, the Presiding Bishop and General Assembly. On April 6, 2022, as evidenced by Exhibit B, the Presiding Bishop and General Assembly issued its decision on the issues. The Presiding Bishop and General Assembly issued its decision specifically and expressly concerning the status of Westside COGIC as a local church within COGIC and the relationship between Bishop Green, NWFJ and Westside COGIC. The decision contemplates the tenants, beliefs, and teachings of COGIC and specifically whether Westside COGIC and its members remained affiliated with COGIC in accordance therewith as determined by the COGIC internal ecclesiastical polity.

Pursuant to the Presiding Bishop and General Assembly's decision, Westside COGIC was never disaffiliated with COGIC, and was permitted to seek affiliation under a jurisdiction other than B. Green's NWFJ. The Presiding Bishop and General Assembly's decision was rendered by the highest ecclesiastical authority of COGIC in relation to the issues raised. Accordingly, Westside COGIC remains a COGIC congregation today, and is now a under the Western Georgia Ecclesiastical Jurisdiction. Attached and fully incorporated herein by reference as Composite Exhibit F, please find the following: June 27, 2022 Confirmation letter from Western Georgia Ecclesiastical Jurisdiction; September 8, 2022 miscellaneous correspondence from West Side COGIC to Bishop Thomas and COGIC regarding their intention and request for transfer to Georgia Western Ecclesiastical Jurisdiction; ***October 27, 2022 correspondence from Bishop Green to West Side COGIC acknowledging West Side COGIC as a COGIC member Church***; November 11, 2022 COGIC General Fund receipt evidencing payment

and acceptance of Pastor Watts' annual dues; COGIC Jurisdictional Financial Report Form F-1 reflecting receipt of Pastor Watts' annual dues; screenshot reflecting receipt by Georgia Western Jurisdiction of collection from West Side to Georgia Western Jurisdiction; January 16, 2023 letter from Bishop John F. Thomas, Jurisdictional Prelate; recent screenshot from COGIC website confirming Pastor Watts and West Side COGIC as members of the Georgia Western Jurisdiction.

After receiving the Presiding Bishop and General Assembly's decision on the issues, *and though each count of the pending complaint is predicated on the representation that West Side is not a COGIC member church*, the Plaintiffs nevertheless continued to pursue this lawsuit seeking the Court to intervene in internal ecclesiastical processes of COGIC.

Memorandum of Law

This case may be summarized as follows: Civil courts may not inquire into internal organizational disputes between different factions of a religious organization or into property disputes that would require interpreting religious doctrine or practice.

The ecclesiastical abstention doctrine governs the Court's disposition of the case. See *Serbian Eastern Orthodox Diocese for U.S. of America and Canada v. Milivojevic*, 426 U.S. 696 (1976). *Franzen v. Poulos*, 604 So.2d 1260 (Fla. 3d DCA 1992). The "ecclesiastical abstention doctrine" (also referred to as the "church autonomy doctrine" or the "religious autonomy principle") shields a hierarchical church from court intervention when that church's hierarchical structure affords its own ecclesiastical tribunals for adjudicating disputes within the church hierarchy. *See Serbian*, at 725 (1976) (reversing state supreme court ruling impermissibly intervening in church adjudication that removed bishops and reorganized dioceses where state court looked beyond face of hierarchical structure and found procedural

and substantive deficiencies in compliance with internal regulations thus finding the church's decision "arbitrary"); and *Franzen v. Poulos*, supra (court lacked jurisdiction to enjoin congregation of hierarchical church's removal of reverend for alleged failure to comply with provisions regarding disciplinary referral to bishop).

"[T]he First and Fourteenth Amendments permit hierarchical religious organizations to establish their own rules and regulations for internal discipline and government, and to create tribunals for adjudicating disputes over these matters. When this choice is exercised and ecclesiastical tribunals are created to decide disputes over the government and direction of subordinate bodies, the Constitution requires that civil courts accept their decisions as binding upon them." *Serbian*, at 724–25.

"For civil courts to analyze whether the ecclesiastical actions of a church judicatory are in that sense 'arbitrary' must inherently entail inquiry into the procedures that canon or ecclesiastical law supposedly requires the church judicatory to follow, or else into the substantive criteria by which they are supposedly to decide the ecclesiastical question." *Id.* at 713.

"[W]here religious organizations establish rules for their internal discipline and governance, and tribunals for adjudicating disputes over these matters, 'the Constitution requires that civil courts accept their decisions as binding upon them.' *Id.* (citing *Crowder v. S. Baptist Convention*, 828 F.2d 718, 724 (11th Cir. 1987)) (citations omitted).

"Civil courts may not inquire into internal organizational disputes between different factions of a religious organization or into property disputes that would require interpreting religious doctrine or practice." *See, Conference Ass'n of Seventh-Day Adventists, Inc. v. Dennis*,

862 So. 2d 842, 844 (Fla. 4th DCA 2003) (citations omitted).

Any resolution of issues between West Side and COGIC is to be determined solely according to the internal COGIC processes, and it is not for this Court to examine the conclusions of those processes. Accordingly, while it would be inappropriate to examine the conclusions of an internal ecclesiastical process, it is appropriate for the Court to adopt those conclusions and reinforce their sanctity by issuing the requested declaratory relief.

As indicated above, COGIC itself cites Serbian decision in its' Joint Order. As that decision explicitly indicates, the judiciary is obliged to defer to the hierarchical church's internal decisional processes on matters of internal church discipline and government." *Franzen*, at 1263. "While the trial court is ordinarily empowered to adjudicate questions of Florida corporate law, a First Amendment exception applies to matters of internal governance of a hierarchical religious organization." *Id.* at 1262.

The Court may only examine the internal processes of a religious organization where that examination involves only neutral legal principles. While this could include an examination of the documents by which a Florida corporation operates, the First Amendment prevents such an examination when the processes detailed therein, "appl[y] to matters of internal governance of a hierarchical religious organization." *Franzen*, at 1262. Plaintiffs' complaint is asking the Court to make its own determination concerning the issues, to reject the findings of the Joint Order, and to define the property rights which inherently stem therefrom. The Court cannot determine whether the processes of COGIC dispute resolution are right or wrong. The Court must recognize that the COGIC dispute resolution process is an ecclesiastical process. That process took place. There was a result. The Court is bound by that result because that result is the express exercise of the rights guaranteed under the First and Fourteenth

Amendment.

The ecclesiastical abstention doctrine is a creature of the First and Fourteenth Amendments of the Constitution of the United States. In *Serbian*, the Supreme Court addressed similar facts as presently before the Court in holding that the Illinois Supreme Court impermissibly examined and overturned the rulings of the church's hierarchical tribunal:

Resolution of the religious disputes at issue here affects the control of church property in addition to the structure and administration of the American-Canadian Diocese. This is because the Diocesan Bishop controls respondent Monastery of St. Sava and is the principal officer of respondent property-holding corporations. Resolution of the religious dispute over Dionisije's defrockment therefore determines control of the property. Thus, this case essentially involves not a church property dispute, but a religious dispute the resolution of which under our cases is for ecclesiastical and not civil tribunals. Even when rival church factions seek resolution of a church property dispute in the civil courts there is substantial danger that the State will become entangled in essentially religious controversies or intervene on behalf of groups espousing particular doctrinal beliefs. Because of this danger, "the First Amendment severely circumscribes the role that civil courts may play in resolving church property disputes." *Id.* at 709 (citation omitted).

The First Amendment "commands civil courts to decide church property disputes without resolving underlying controversies over religious doctrine" *Presbyterian Church v. Hull Church*, 393 U.S. 440, 449 (1969). The driving principle of the ecclesiastical abstention doctrine is avoidance of excessive government entanglement with religion by prohibiting civil courts from interfering with internal church disputes. *See Bendross v. Readon*, 89 So. 3d 258, 259-60 (Fla. 3d DCA 2012) (civil court not barred from considering lawsuit since church bylaws did not address removal of directors and the matter could be resolved by applying neutral principles of law without resolving religious controversy). This provides "a spirit of freedom for religious organizations, [and] an independence from secular control or manipulation – in short, power to decide for themselves, free from state interference, matters of

church government as well as those of faith and doctrine.” *Kedroff v. St. Nicholas Cathedral*, 344 U.S. 94, 116, 73 S.Ct. 143, 97 L.Ed. 120 (1952).

In *Rekas v. Polish Nat'l Catholic Church Western Diocese*, 102 So. 2d 705 (Fla.1958), the national church organization along with the regional bishop and local priest sought to enjoin an acting pastor and the parish committee from holding themselves out as the local church and from the use of church property, among other things. The regional bishop suspended the acting pastor and the parish committee in accordance with the laws of the hierarchical church and the bishop appointed a new priest. The suspended membership refused to relinquish control of their positions and the church property to their successors. Three-fourths of the local congregation defected with the suspended pastor while a quarter remained loyal to the bishop and the national church. The unfaithful majority purported to amend the charter of the non-profit, in which church assets were titled, to allow for affiliation with a different church. In light of the church's established hierarchical law, the trial court deferred to the bishop and permanently enjoined the dissenters from possessing or using any church property and held that such property was solely for the benefit of the fractional remnant of the congregation who “continue in harmony with the concepts, beliefs and orders of the national organization and its [bishop].” *Id.* at 705-06. The trial court ordered additional appropriate remedies including removal of the rogue pastor from his post and the church grounds, all of which were affirmed by the Florida Supreme Court.

Recently, the Court of Appeal for the Fifth District strongly affirmed the application of the ecclesiastical abstention doctrine in the context of an employment contract. In *Napolitano v. St. Joseph Catholic Church*, 308 So. 3d 274 (Fla. 5th DCA 2020), the appellant challenged the dismissal of her claims for breach of an employment contract by the appellees, which included

the pastor, the church, and the bishop. The bishop removed the prior pastor and the newly appointed pastor promptly terminated appellant's employment without notice in violation of the proffered contract. The termination papers provided that appellant's termination was due to a reduction in workforce, but the new pastor subsequently hired two employees to replace appellant. The trial court properly framed the dispute as whether the removed pastor had actual or apparent authority to unilaterally enter into the agreement with appellant. The affirmed decision of the trial court held that resolving that issue would necessarily require analysis of a pastor's duties and his role in the broader church organization. Therefore, the trial court lacked subject matter jurisdiction and the case was properly dismissed. The Court succinctly articulated all matters in which it must abstain: "our inquiry is whether this dispute is one of discipline, faith, internal organization, or ecclesiastical rule, custom, or law. If so, secular courts lack the authority to resolve the dispute and there is no need for judicial balancing tests -- the First Amendment has already struck that balance." *Id.* at 279. In contravention of this principle, appellant asked the Court to "examine a hierarchical religious organization and determine who has the authority to speak and act on its behalf." *Id.*

Florida's First District Court of Appeal has distinguished cases that are susceptible to resolution by applying only neutral legal principles and those that inherently implicate the First Amendment. In *Word of Life Ministry, Inc. v. Miller*, 778 So. 2d 360 (Fla. 1st DCA 2001), the court was permitted to resolve the dispute over corporate assets in the face of dissolution proceedings as such determination was governed by Florida Statutes and its articles of incorporation and bylaws. Notably, the dispute was not resolvable by ecclesiastical tribunal, the church was not subject to hierarchical governance, expulsion of members was not at issue, and the core dispute was over property. Alternatively, in *Rosenberger v. Jamison*, 72 So. 3d

199 (Fla. 1st DCA 2011), the court noted that facially the dispute concerned adherence to corporate bylaws and was theoretically resolvable through neutral legal principles as it concerned property like in *Word of Life*. However, upon closer examination, the controversy revolved around how the church should govern itself, the determination of which would resolve the property dispute. Importantly, the church had established procedures under its bylaws for terminating members and therefore any inquiry into whether the Church complied with its laws in excluding members “necessarily entangles the court in religious matters...” *Id.* at 204.

The bottom line is that to interpret the internal rules and regulations of COGIC and question whether the application of those rules was done properly would amount to the impermissible interpretation of religious practice. The processes of Church discipline and governance as detailed in COGIC’s Constitution and Official Manual are processes firmly rooted in the ecclesiastical government of COGIC which reflect religious and theological expressions protected by the First and Fourteenth Amendments. It is not for the Court to examine whether the ecclesiastical actions taken by the Presiding Bishop and General Assembly, or COGIC’s church judicatory, were in accordance with ecclesiastical canon. The Court should recognize that the Presiding Bishop and General Assembly is the highest ecclesiastical authority of COGIC. Accordingly, this Court is bound by the Presiding Bishop and General Assembly’s final decision in these matters.

The Court may only determine: (1) whether there exists an ecclesiastical process which contemplates the present controversy; (2) whether such an ecclesiastical process took place; and (3) whether such an ecclesiastical process resulted in a determination of the highest applicable ecclesiastical authority. Should the Court determine those issues in the affirmative, the instant lawsuit impermissibly asks this Court to interpret religious doctrine

and practice in violation of the First and Fourteenth Amendments to the Constitution of the United States of America.

The First District Court of Appeals reasoning within *Rosenberger v. Jamison* is applicable in the instant case. 72 So. 3d 199 (Fla. 1st DCA 2011). "Even where neutral law applies, secular courts must not 'become entangled in essentially religious controversies or intervene on behalf of groups espousing particular doctrinal beliefs.'" *Id* at 204. (quoting, *Serbian*, 426 U.S. at 709). In the instant case, the underlying dispute of each count or cause of action "concerns the Church's form of governance, and the First Amendment prohibits civil courts from adjudicating such ecclesiastical matters." *Id* at 203. Therefore, each count of the Plaintiff's Complaint impermissibly asks this Court to interpret religious doctrine and/or practice in violation of the First and Fourteenth Amendments to the Constitution of the United States of America.

"The church autonomy doctrine is based on the Free Exercise Clause of the First Amendment. The doctrine prevents secular courts from reviewing disputes requiring an analysis of 'theological controversy, church discipline, ecclesiastical government, or the conformity of the members of the church to the standard of morals required,' and under the doctrine, secular courts must accept the decision by the highest ecclesiastical authority on such matter." *Malichi v. Archdiocese of Miami*, 945 So. 2d 526, 529 (Fla. 1st DCA 2006)(quoting *Watson v. Jones*, 80 U.S. 679, 728 (1871)). The highest ecclesiastical authority on the present controversy is the Presiding Bishop and General Assembly, and as the Presiding Bishop and General Assembly have rendered final decisions on the present controversy, these decisions are binding on this Court.

Westside COGIC has long existed, and continues to exist, as an interdependent branch of a broader ecclesiastical organization (COGIC) with its own governance, policies, and procedures. Westside COGIC remains a local church of COGIC in accordance with the COGIC Constitution and Official Manual. Westside COGIC, through its congregation represented by the members, continues as a member local church of COGIC as determined by the COGIC internal ecclesiastical government. The Presiding Bishop and General Assembly are the highest ecclesiastical authority on the processes of church discipline and governance and rendered decisions in both processes which are binding on Westside Church and NWFJ. Plaintiffs and Defendants are bound by the decision of the Presiding Bishop and General Assembly, as this Court is precluded by the protections of the First and Fourteenth Amendments to the Constitution of the United States from adjudicating or analyzing issues of ecclesiastical governance.

The Court must accept the decisions of the Presiding Bishop and General Assembly as binding and defer to its recognition of West Side COGIC as a member local church as it exists within the COGIC hierarchy.

Finally, the undersigned just recently became aware of an event related to the present action: In August of 2022 (Case no. 2022-WG-0822), and again in October of 2022 (Case No. 2022-WG-1020), the COGIC Board of Bishops accepted Ecclesiastical charges against Bishop Green filed by several members within his NWF jurisdiction. It appears that COGIC has opened a full investigation into the actions of Bishop Green, and Bishop Green is awaiting trial for violating COGIC's constitution, laws, rules, and regulations; abusing his authority as a COGIC bishop (as he only has ecclesiastical authority), while invoking COGIC, Inc. in lawsuits without authorization from the Presiding Bishop (as specifically referenced within Exhibits A, B and C).

Attached hereto for reference as composite Exhibit G, please find the following: August 22, 2022 Correspondence from the COGIC Board of Bishops).

In short, according to the aforementioned federal and Florida decisions, and the explicitly stated position of Church of God in Christ, Inc., the Court lacks subject matter jurisdiction over this matter, and therefore this issue must be resolved before the Court may consider any other matters within the instant case. Should the Court decide to move past the issue of subject matter jurisdiction, the following issues must be addressed:

- a. COGIC has clearly stated multiple times that Bishop Green had no authority to file the lawsuit in the first place;
- b. Each of the Plaintiff's claims are expressly predicated on the allegation that West Side COGIC was not, or is not, a local Church member of COGIC. As this is incorrect, and in light of the fact that West Side has at all times material been a COGIC local Church member, all of the allegations based on that premise are moot; and
- c. The totality of the Plaintiffs' complaint is also predicated on allegations that the deeds to the real property at issue do not conform to COGIC mandates; but the deeds at issue have been corrected, and the corrected deeds have been recorded in the Official Records of Escambia County, FL.

Accordingly, the Defendants respectfully request this Court to dismiss the pending Complaint as to all counts, to respect the decision of the Presiding Bishop and General Assembly on these matters of ecclesiastical polity as binding on the Court. To do otherwise, and entertain the counts plead in the pending complaint would require the Court to intrude into church doctrine in violation of the ecclesiastical abstention doctrine." *Springhill Missionary Baptist*

Church, Inc. v. Mobley, 251 So. 3d 281, 284 (Fla. 1st DCA 2018). For the same reasons, the existing order granting temporary injunction should also be withdrawn or extinguished. Further, each of the reasons set forth above are case-dispositive, and dismissal of all claims with prejudice is appropriate.

WHEREFORE, in light of the foregoing, Defendants respectfully request that the Court enter an Order:

- a. Dissolving or vacating the standing temporary injunction;
- b. Dismissing all remaining claims and counterclaims with prejudice; and
- c. any further relief this Court deems just and proper.

Respectfully submitted this 2nd day of February, 2023.

/s/ Christopher R. Johnson
Christopher R. Johnson, Esq.
FL Bar No. 000187
Trinidad Law Group, PLLC
7 North Coyle Street
Pensacola, FL 32502
850-433-8529
800-237-1468 facsimile
trinidadlaw@yahoo.com

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing was e-filed with the Florida E-filing Portal and sent to counsel for Plaintiff, Fredrick J. Gant, via email to fjgant@yahoo.com: this 2nd day of February, 2023.

/s/ Christopher R. Johnson
Christopher R. Johnson, Esq.



JONATHAN SAFFOLD, JR.

6716 N. Atwahl Drive
Glendale, Wisconsin 53209-3408

(p) 414.331.4864

jsaffold@cogic.org

February 8, 2022

VIA EMAIL: www.crjohnsonlaw.com

Christopher R. Johnson
7 North Coyle Street
Pensacola, Florida 32502

Re: West Side Church of God in Christ Requests for Reinstatement & Clemency

This letter confirms that I am in receipt of your letter to the General Assembly for Reinstatement and your letter to the Presiding Bishop requesting Executive Clemency in the form of "restoration" to a pastor and church in good standing with the Church of God in Christ. Your requests, as set forth in these respective letters, are currently under review and prayerful consideration.

Consistent with the vision and perspective of our founder, Bishop C.H. Mason, we believe that matters of this nature are ecclesiastical and more appropriately resolved pursuant to the Constitution and resolutions of our church whenever possible and practical. It is my hope that both parties in this action, West Side Church and Bishop Green, will agree to stay all civil legal proceedings until both the General Assembly and Presiding Bishop have concluded their respective consideration of your requests.

As a final point of clarification, notwithstanding the caption in your current lawsuit, the Church of God in Christ, Inc. has not initiated a legal action against West Side Church of God in Christ, Inc. The initiation of litigation in the name of Church of God in Christ, Inc., is a civil matter, not ecclesiastical. Ecclesiastical jurisdictional bishops do not have the authority to initiate or amend litigation invoking the name of the Church of God in Christ, Inc. The power to initiate or amend litigation naming the Church of God in Christ, Inc. as a party plaintiff rests solely within the express power of the President (Presiding Bishop) and Board of Directors (General Board) of the civil structure, the corporation of the Church of God in Christ, Inc.

If anything further is required to complete consideration of either request, either myself or a representative of the General Assembly will contact you.

CHURCH OF GOD IN CHRIST, INC.

J. Saffold

General Counsel

CC:

Bishop J. Drew Sheard, Presiding Bishop
Bishop L.F. Thuston, Chairman, General Assembly



Church Of God In Christ, Inc.



General Assembly

Bishop L. F. Thuston, Chairman



Reconciliation and Mediation Committee

Dr. Frederick D. Jenkins, Chairman

Green vs Watts

Ex B



Reconciliation and Mediation Committee

Green vs Watts

The case before us in our opinion was precipitated by emotions and over reaction. This committee is not assigned to litigate nor adjudicate the case but to find resolution. While much of this case may find a place in the secular arena, in our culture, customs, tradition and history they are not unforgivable. Ignorance of the law is no excuse, neither is ignorance of our church policies. However, in the ecclesia we seek to save and restore for the bible tells us in:

Galatians 6:1-3:

- 1 *Brethren, if a man be overtaken in a fault, ye which are spiritual, restore such an one in the spirit of meekness; considering thyself, lest thou also be tempted.*
- 2 *Bear ye one another's burdens, and so fulfil the law of Christ.*
- 3 *For if a man think himself to be something, when he is nothing, he deceiveth himself.*

A detailed accounting of our findings of facts will be given to the leadership of our church. However, in the interest of time we believe this summary of our findings will be sufficient for this report to the delegates.

Less we forget we are (a church, a body of baptized believers.) with the power to mediate and forgive. When conflict occurs between clergy that affects the laity what do we do? Scripture tells us in:

Matthew 18:15-17

- 15 *Moreover if thy brother shall trespass against thee, go and tell him his fault between thee and him alone: if he shall hear thee, thou hast gained thy brother.*
- 16 *But if he will not hear thee, then take with thee one or two more, that in the mouth of two or three witnesses every word may be established.*
- 17 *And if he shall neglect to hear them, tell it unto the church: but if he neglects to hear the church, let him be unto thee as an heathen man and a publican.*

Our Findings:

The Pastor:

Did in fact dispose of church property that he was assigned to in a way that could create a legal challenge for the Church Of God In Christ. Trustee cannot buy trust asset because the asset belong to someone else. Unless he pays the full price for it. Doing so could be considered stealing and can lead to an array of legal woes.

Dissolve a Florida Not for profit corporation a church he was assigned to (Westside COGIC of Escambia County Florida) without notice to the Jurisdictional Bishop. To us this was not a fraudulent act. Still ignorance of the law is no excuse.

It was alleged; though we have not been presented with evidence that the Pastor defamed the Jurisdictional Bishop. The first Amendment to the US Constitution gives one the right to freedom of speech.

He did not exhaust all remedies in the ecclesia.

There was a host of things alleged to have been said and done at the hand of the Pastor and many maybe answerable in the secular arena; we have been presented with no hard evidence to that affect. In our view, none the allegations are beyond the forgiving power of the church.

The Jurisdictional Bishop:

Did in fact make a valiant effort to save property he believed belong to the Church Of God In Christ and to defend the integrity and good name of the Church Of God In Christ.

Did in fact send letters to the parties involved. While we see the dates the letters were manufactured, we cannot be confident of the dates of delivery.

He did not exhaust all remedies in the ecclesia.

Did involve the Church Of God In Christ, Inc. in a civil litigation without permission from the Leadership of the Church Of God In Christ, Inc. to do so.

Did represent himself as an (Agent) of the church when he is in fact according to our Official Manual:

The representative within the Ecclesiastical Jurisdiction of his assignment, that did not give him the power to involve the Church Of God In Christ, Inc. in any legal matters without permission to do so. In this act he has put the church at risk.

None of these acts are unforgivable.

Our Opinion:

To us this is a matter that could have been resolved in the ecclesia without intervention of the secular arena. There is contributory negligence on the part of the Pastor for not knowing and following the existing policies of our Church. There is contributory negligence on the part of the Jurisdictional Bishop for not supervising more closely with periodic visits. There is no record that he went to his immediate supervisors: the Board of Bishops, Presiding Bishop or General Board, before he went to the secular arena. We pray that lessons are learned from this.

All a matter of emotions, things said that weren't really meant, but out of anger and frustration said anyway, efforts to mar the reputation of each other to what end after all we are the children of God and we are a body of baptized believers with the power to love and forgive. The bible teach us in:

2 Corinthians 5:18-21

- ¹⁸ *And all things are of God, who hath reconciled us to himself by Jesus Christ, and hath given to us the ministry of reconciliation;*
- ¹⁹ *To wit, that God was in Christ, reconciling the world unto himself, not imputing their trespasses unto them; and hath committed unto us the word of reconciliation.*
- ²⁰ *Now then we are ambassadors for Christ, as though God did beseech you by us: we pray you in Christ's stead, be ye reconciled to God.*
- ²¹ *For he hath made him to be sin for us, who knew no sin; that we might be made the righteousness of God in him.*

1 Corinthians 6:1

- ¹ *Dare any of you having a matter against another go to law before the unjust and not before the saints.*

So here we are now before the saints let us not forget the instruction of scripture:

Isaiah 1:18-20

- ¹⁸ *Come now, and let us reason together, saith the LORD: though your sins be as scarlet, they shall be as white as snow; though they be red like crimson, they shall be as wool.*
- ¹⁹ *If ye be willing and obedient, ye shall eat the good of the land:*
- ²⁰ *But if ye refuse and rebel, ye shall be devoured with the sword: for the mouth of the LORD hath spoken it.*

Hebrews 12:14

- ¹⁴ *Follow peace with all men, and holiness, without which no man shall see the Lord:*

Our Recommendations:

Both the Plaintiff and Defendant shall dismiss all their civil actions in and relating to this case with prejudice to refiling.

The Pastor will before the General Assembly recant any and all disparaging remarks made by him about The Church Of God In Christ, The Jurisdictional Bishop and the Bishopric.

That upon resolution of this matter The Pastor and his congregation is permitted to transfer ecclesiastical jurisdiction without interference.

The property located at 2313 G Street will be re-titled to the Westside Church of God in Christ with the Trust Clause included

The property located at 1100 Yonge Street will also be re-titled to Westside Church of God in Christ with the Trust Clause included with an arrangement that the Huffs will not be displaced.

The property located at 51 Marshall Street to date there has been no evidence presented to this Committee that either Church Of God In Christ, Inc. invested or Northwest Florida Ecclesiastical Jurisdiction invested in the purchase or development of this property therefore the property and its development shall remain with those who invested in it.

The deed shall in its name bare Church of God in Christ with the Trust clause being added to the title with supervision and oversight from the National Board of Trustee Church Of God In Christ for a period of three years.

Westside Church Of God In Christ never really completed the process to leave the Church Of God In Christ in our view they were never official out of the Church Of God In Christ. Therefore reinstatement is not necessary.

But for the fact that the Pastor sent a letter through his attorney to the Jurisdictional Bishop trying to disaffiliate from the Church Of God In Christ.

But for the fact that the Jurisdictional Bishop chose to pursue a remedy in the secular arena before exhausting all remedies in the ecclesia.

But for those two facts we would not be where we are today. Therefore, it is the recommendation of this Committee that both the Plaintiff and the Defendant bare their own legal expenses and court cost.

The Church Of God In Christ, Inc. shall bare no expense in either case since the legal action was imitated without authorization to either party from Church Of God In Christ, Inc.

The request for Executive Clemency is beyond the scope and authority of this Committee. That is the sole authority of the Presiding Bishop and General Board.

Upon passage in the General Assembly the parties, plaintiff and defendants are bound by this report and recommendations.

Should the parties one or both refuse or neglects to fully comply with the recommendation of this Committee the Executive Branch of our church, since the name Church Of God In Christ, Inc. is listed as plaintiff, will instruct General Counsel for the Church Of God In Christ, Inc. to take over the case and settle it. The Executive Branch may take appropriate action against the party or parties who refuses to comply since the orders of the General Assembly is binding.

Mr. Chairman I so move the adoption of this report and recommendations.

April 2022 General Assembly Session

Dr. Frederick D. Jenkins, Chairman
Bishop Embra R. Patterson, Jr., Mediator
Dr. Andre Johnson, Legal Analyst
Supervisor Dr. Diane L. Jenkins, Grammarian
Dr. Lanelle Perry, Secretary
Bishop Designate Dr. Robert E. Garner
Supt. Larry Franklin
Supervisor Dr. Fay M. Butler
Supt. Lawrence H. Murray

JOINT ORDER
OF THE
PRESIDING BISHOP & GENERAL ASSEMBLY

INTRODUCTION

Comes now the Church Of God In Christ, Inc., with World Headquarters in Memphis, Tennessee, and local churches globally in answer to the petition for resolution in the ecclesia from the principals involved in Case Number 2021CA002561, and related and/or associated cases.

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

Case Number 2021CA002561

CHURCH OF GOD IN CHRIST, INC.

NORTHWEST FLORIDA JURISDICTION
CHURCH OF GOD IN CHRIST, INC.,
WEST SIDE 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 CHURCH OF GOD IN CHRIST
WEST SIDE MINISTRY, INC. WEST SIDE
CHURCH OF GOD IN CHRIST ESCAMBIA COUNTY,
WESTSIDE MINISTRY, INC, COSTON HUFF AND FRANKIE LEE HUFF

Defendants.

SYLLABUS BY THE COURT

The jurisdiction of Civil Courts to address matters involving church affairs is limited. Neither state nor federal courts may undertake the resolution of quintessentially religious controversies, whose resolution the First Amendment to the Constitution of the United States of America commits exclusively to the highest ecclesiastical tribunals of the Church.

The Establishment Clause of the First Amendment to the Constitution of the United States of America prevents the government from appointing ministers. The Free Exercise Clause also prevents the government from interfering with the freedom of religious groups to select their own. The First Amendment permits hierarchical religious organizations to establish their own rules and regulations for internal discipline and government and to create tribunals for adjudicating disputes over such matters.

Ex C

Purely theological questions and matters ecclesiastical in character must be determined by the authorities of the particular church involved according to its laws and usage.

The Church of God in Christ, Inc. is a long established ecclesiastical organization. Numerous local churches are a part of its' defined ecclesiastical hierarchical system. See *Serbian Orthodox Diocese v. Milivojevich*, 426 U.S. 696, 49 L. Ed. 2d 151, 96 S. Ct. 2372, reh. denied 429 U.S. 873 (1976) (Supreme Court recognized that the Orthodox church was a "hierarchical church," with a governing body, set rules of procedure, and an internal appeals procedure). The Church of God in Christ is typically organized with various Pastors, District Superintendents, and Bishops. See *Church of God v. Middle City Ch. of God*, 774 S.W.2d 950, 951 (Tenn. App. 1989).

The National Church has duly adopted a constitution, policies, procedures, by-laws and a Judicial Code of Conduct applicable to its' members and local churches. The Pastor of the Local church is responsible for ensuring local compliance with the National Church's doctrinal and other policies and is empowered by the Jurisdictional Bishops upon appointment within their jurisdiction. See *Church of God in Christ, Inc. v. Graham*, 54 F.3d 522, 524 (8th Cir. 1995). Part I, the Constitution, Article III, Part 2.

Section D, ¶¶ 5, 9, and 11 and Section J. of the Official Manual of the Church of God in Christ.

STATEMENT OF JURISDICTION

The Official Manual of the Church Of God In Christ, Copyright 1973, reprinted in 1991 and 1992 in Article III, Part II, Section B. states:

“The General Assembly is the supreme legislative and judicial authority of the Church Of God In Christ. It is the only tribunal which has power to express doctrine and creeds of the Church, and its decisions shall be binding on all members of the Church Of God In Christ.”

STATEMENT OF THE CASE

This case arose out of a dispute between a local pastor and the Jurisdictional Bishop, without exhausting all remedies in the ecclesia, and without leave of the church to do so, the above sited case was filed in the secular court. Upon being made aware of this flaw the parties' petitioned the church through the Presiding Bishop and Chief Apostle and the General Assembly to bring resolution to the above sited case and all related or associated civil actions.

JOINT ORDER

Per the Petitioners request and after careful and prayerful review of the documents presented by the Petitioners in the above sited case this Joint Orders is rendered:

1. Both the Plaintiff and Defendant in the above referenced legal action shall dismiss all their civil actions, with prejudice to refilling.

2. The Pastor will recant any and all disparaging remarks to and about the Church of God In Christ and the Jurisdictional Bishop, before the General Assembly, and will refrain from any future such remarks.
3. The Pastor and his congregation will be permitted to transfer and/or register its existing church with an ecclesiastical jurisdiction in Florida, or a contiguous state, without interference.
4. The property located at 2313 G Street will be re-titled to include the Church of God in Christ, Inc. constitutionally mandated "Trust Clause". This facility has an estimated value of \$50,000-\$100,000, and is currently free and clear of all liens and/or encumbrances. It is recommended that Bishop Green recoup all of his legal fees and any other expenses he may have incurred in the arising from this action through the sale, disposition or occupancy of this property by a newly placed church and/or ministry under the supervision of Bishop Green.
5. The title to the property located at 51 Marshall Street shall be changed to include the name "Church of God in Christ", and will include the constitutionally mandated Trust Clause.
6. West Side Ministries COGIC shall be declared a church in "good standing" within the Church of God in Christ, Inc., and placed under supervision and oversight from the National Board of Trustees of the Church Of God In Christ for a period of three (3) years.
7. Both the Plaintiff and Defendant shall bare their own legal expenses and court costs.
8. The Church of God In Christ, Inc. shall bare no expense in this case, since the legal action was initiated without authorization to either party from Church of God In Christ, Inc.
9. The request for Special Clemency in the form of restoration is granted to Pastor Kenneth Watts by the Presiding Bishop, and affirmed by the General Board.

Should the parties one or both refuse or neglect to fully comply with this Joint Order, since the Church Of God In Christ, Inc. is listed as plaintiff, the Executive Branch of the church will instruct General Counsel for the Church Of God In Christ, Inc. to take over the case and settle it and the Executive Branch may take appropriate action against the party or parties who refuses to comply.

So Ordered and Effective: April 6, 2022

Bishop J. Drew Sheard, Presiding Bishop

A handwritten signature in black ink, appearing to read "J. Drew Sheard", written in a cursive style.



JONATHAN SAFFOLD, JR.
6716 N. Atwahl Drive
Glendale, Wisconsin 53209-3404
(p) 414 331 4864
jsaffold@coqic.org

June 7, 2022

VIA EMAIL: fgant@yahoo.com

Frederick J. Gant, Esq.
322 West Cervantes Street
Pensacola, FL 32501

VIA EMAIL: www.crjohnsonlaw.com

Christopher R. Johnson, Esq.
7 North Coyle Street
Pensacola, FL 32502

RE: Case Number 2021CA002561 (NW Florida Jurisdiction vs. Watts)

Genetlemen, attached to this letter is the signed final draft of the Joint Order of the Presiding Bishop and General Assembly in the above referenced matter.

As you will note, Item 5 of the draft I sent on May 26th has been deleted from this final draft. Item 5 provided as follows:

"The property located at 1100 Yonge Street will be sold to Northwest Florida Ecclesiastical Jurisdiction for \$25,000."

This provision has been deleted because the 100 Yonge Street property has private owners, and an agreement for its sale could not be reached by the private owners and NW Florida Jurisdiction.

If you have any questions, feel free to contact me.

Date: June 7, 2022

General Counsel

Jonathan Saffold, Jr.

CC:

Bishop J. Drew Sheard, Presiding Bishop
Bishop L.F. Thuston, General Assembly Chairman
Bishop Willie C. Green, Prelate NW Florida Jurisdiction
Dr. Frederick Jenkins



JONATHAN SAFFOLD, JR.
6716 N. Atwahl Drive
Glendale, Wisconsin 53209-3408
(p) 414.331.4864
jsaffold@cogic.org

July 6, 2022

VIA EMAIL: fjgant@yahoo.com

Frederick J. Gant, Esq.
322 West Cervantes Street
Pensacola, FL 32501

VIA EMAIL: www.crjohnsonlaw.com

Christopher R. Johnson, Esq.
7 North Coyle Street
Pensacola, FL 32502

RE: Case Number 2021CA002561 (NW Florida Jurisdiction vs. Watts)

Gentlemen, please take note that the Church Of God In Christ, Inc's Final Joint Order is **Amended** in that **item #4** is now **Deleted**:

4. The property located at 2313 G Street will be re-titled to include the Church of God

in Christ, Inc. constitutionally mandated "Trust Clause". This facility has an estimated value of \$50,000-\$100,000, and is currently free and clear of all liens and/or encumbrances. It is recommended that Bishop Green recoup all of his legal fees and any other expenses he may have incurred in the arising from this action through the sale, disposition or occupancy of this property by a newly placed church and/or ministry under the supervision of Bishop Green.

This item has been **Deleted** because of concerns raised as to it's implication, not the intent.

If you have any questions, feel free to contact me.

Date: July 6, 2022

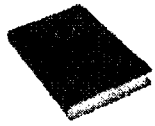
General Counsel

Jonathan Saffold, Jr.

CC:

Bishop J. Drew Sheard, Presiding Bishop
Bishop L.F. Thuston, General Assembly Chairman
Bishop Willie C. Green, Prelate NW Florida Jurisdiction
Dr. Frederick Jenkins, Senior Advisor to General Counsel

Ex E



Western Georgia Ecclesiastical Church-Albany District
 Superintendent Samuel Paige
 Eufaula Church of God In Christ



Prelate: Bishop John Thomas

Supervisor: Mother Perrella Hines

Superintendent Samuel Paige
 46 Gammage Road
 Eufaula, AL 36027

June 27, 2022

SUBJECT: Confirmation Letter

Greetings in Christ!

We continue to thank the Lord for how he is protecting us during this COVID-19 pandemic. We believe he is going to continue to Teach us, Lead us, and Guide us. We are praying for our Bishop, district and churches.

This Confirmation letter is verification in stating that Pastor Watts & Westside Ministry, Inc are members of Western Georgia Ecclesiastical Church-Albany District COGIC, Inc. The national headquarters is located in Memphis, Tennessee.

Pastor Watts & Westside Ministry, Inc will be under Superintendent Samuel Paige. The Address for Westside Ministry, Inc. is as follows:

Pastor Kenneth Watts
 Westside Ministry, Inc
 51 Marshall Lane
 Pensacola, FL 32505

For questions or comments please contact me at 334-695-1654.

Blessings in Christ,

Superintendent Samuel Paige

PHONE: 334-695-1654

EMAIL: eufaulacogic@yahoo.com

Western Georgia Ecclesiastical Church of God In Christ—Albany District

Comp Ex F

Pastor Kenneth W. Watts Sr.
Westside Ministry, Inc. COGIC
51 Marshall Lane
Pensacola, Florida 32505
Paulawatts57@yahoo.com
Kenwatts101@gmail.com

Mailing address:
5123 Crestwood Rd
Pensacola, Florida, 32503
850-375-7300-C 850-476-7782-H

September 8, 2022

Bishop John Franklin Thomas
Walker Tabernacle COGIC
816 MLK, Jr. Blvd
Albany, GA 31701

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

Reference: *Transfer of church to Georgia Western Ecclesiastical Jurisdiction, Jurisdictional Bishop, Bishop John Franklin Thomas.*

Dear Bishop John Franklin Thomas,

Greetings in the matchless name of our Lord and Savior, Jesus Christ. I pray this letter finds you and yours prospering and in good health.

This letter is to inform you that I, Pastor Kenneth W. Watts Sr., the Pastor of Westside Ministry, Inc., plan to vote at my church to see if two-thirds (2/3) of the membership is in agreement with the transfer. At present, there are thirty-seven (37) members on the roll and in good standing. Therefore, twenty-five (25) will have to be present and in agreement with the transfer.

My church is located at 51 Marshall Lane, Pensacola, Florida 32505, and is currently affiliated with the Northwest Florida Jurisdiction (NWFLJ). Bishop Willie C. Green is the jurisdictional bishop of NWFLJ and resides at 296 Bradwell Road, Quincy, FL, 32351.

The date of the vote will be Sunday, October 16, 2022.

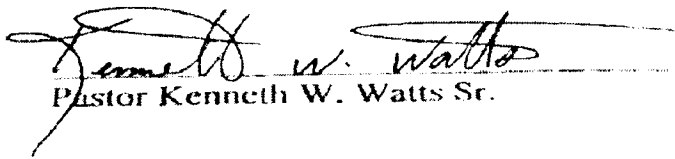
The time of the vote will be at 1:30 p.m. CST.

The location of the vote will be at my local church, Westside Ministry, Inc., 51 Marshall Lane, Pensacola, Florida, 32505. Please notify me if you intend to send an observer.

Notification of my church's intent to vote was sent on September 15, 2022, to Bishop Willie C. Green, Bishop John F. Thomas, and Bishop Joel H. Lyles via First-Class and electronic mail.

I look forward to completing this process very soon; Thank you so much for your time and service to God's people.

God's Blessings upon you is my prayer.


Pastor Kenneth W. Watts Sr.

Cc: Bishop Willie C. Green

Pastor Kenneth W. Watts Sr.

5123 Crestwood Road
Pensacola, Florida 32503
Contact Number: 850-375-7300
Email Address: paulawatts57@yahoo.com

September 8, 2022

Reference: Transfer of Church to Georgia Western Ecclesiastical Jurisdiction

Dear Bishop John Franklin Thomas,

Greetings in the matchless name of our Lord and Savior, Jesus Christ. I pray this letter finds you and yours prospering and in good health.

This letter is to inform you that I plan to vote at my church to see if two-thirds (2/3) of the membership is in agreement with the transfer. At present, there are thirty-seven (37) members on the roll and in good standing. Therefore, twenty-five (25) will have to be present and in agreement with the transfer.

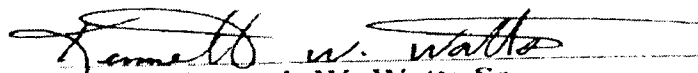
My church is located at 51 Marshall Lane, Pensacola, Florida 32505, and at present, a part of the Northwest Florida Jurisdiction, under the leadership of Bishop Willie C. Green, who resides at 296 Bradwell Road, Quincy, Florida 32351.

The date of the vote will be Sunday, October 16, 2022.

The time of the vote will be at 1:30 p.m. CST.

The location of the vote will be at my local church located at 51 Marshall Lane, Pensacola, Florida, 32505. Please notify me if you intend to send an observer.

God Bless you is my prayer.


Pastor Kenneth W. Watts Sr.

Pastor Kenneth W. Watts Sr.

5123 Crestwood Rd
Pensacola, Florida, 32503
paulawatts57@yahoo.com
850-375-7300-C 850-476-7782-H

September 8, 2022

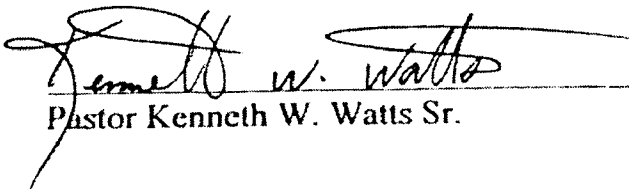
Bishop John Franklin Thomas
Walker Tabernacle COGIC
816 MLK Jr. Blvd.
Albany, GA 31701

Via Certified Mail and Electronic Mail

Greetings in the name of our Lord and Savior Jesus Christ.

This letter shall serve as notification of my church's intent to vote.

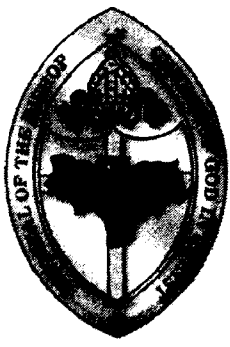
I certify that Bishop Willie C. Green and the General Secretary, Bishop Joel H. Lyle, have been provided a copy of this letter via electronic mail and First-Class mail.



Pastor Kenneth W. Watts Sr.

Encl:

**Cc: Bishop Joel H. Lyles Jr.
Bishop Willie C. Green**



Church Of God In Christ

Northwest Florida Ecclesiastical Jurisdiction, Inc.

Bishop Willie C. Green, Jurisdictional Prelate

October 27, 2022

TO: Westside Ministry

RE: Fifth Sunday Fellowship Participation

Most beloved members:

This comes as a reminder to you that your Fifth Sunday Fellowship Service will take place on Sunday, October 30, 2022 at 11:45 at St. Mark Church of God in Christ in Pensacola, FL. I, along with Superintendent Henderson and District Missionary Jones, am encouraging you to attend and participate in this service. As you know Westside is a member church in the Northwest Pensacola District. Please attend and show your support for the leaders of your district.

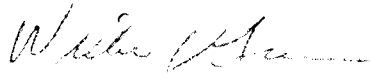
Furthermore, as members of Florida Northwest Jurisdiction, I am asking you to participate in our upcoming monthly conference call that will take place on Monday night at 7:00 CST. If you have forgotten the conference call in number, please contact Supt Henderson as soon as possible.

Finally, COGIC's Holy Convocation is rapidly approaching. I am hopeful that some of you will be in attendance to experience what I believe will be a great, uplifting move of God that will inspire the saints of Our Lord. Qualified delegates are eligible to attend the General Assembly which will convene on that Monday, following Sunday, the official day when we will hear from our beloved Presiding Bishop Sheard. If any member qualifies as a

delegate and would like to attend the General Assembly that member needs to register as soon as possible by contacting the Jurisdictional Secretary.

If you need to contact me, please do not hesitate to call. May God's love, grace, and peace abide with you all.

Prayerfully,



Bishop Willie C. Green

Jurisdictional Prelate

Jurisdictional Headquarters

400 E JORDAN STREET ♦ PENSACOLA, FL 32503

COGIC GENERAL FUND

938 MASON ST
MEMPHIS, TN 38126
9019479353

Cashier: FRANK ^ WHITE

Transaction 6300049

Total	\$400.00
CREDIT CARD SALE	^ 400.00
VISA 7510	

Retain this copy for statement
validation

11-Nov-2022 2:33:34P
\$400.00 | Method: EMV
VISA CREDIT XXXXXXXXXXXX7510
ROY G PRIMUS
Reference ID: 231500500238
Auth ID: 011619
MID: *****8883
AID: A0000000031010
AthNtwkNm: VISA
SIGNATURE VERIFIED

Online: <https://clover.com/p/13TD0EAG05RHR>


Payment 13TD0EAG05RHR

Clover Privacy Policy
<https://clover.com/privacy>

\$775.00

For From Pastor Kenneth
Watts \$275 Net \$500 Pastor
Today at 4:46 PM



Completed 

4:57 PM

Supt. Paige. I just.
Received \$775
from Pastor Watts.
Supt. Primus

4:58 PM



Western Georgia Ecclesiastical Jurisdiction
Church Of God In Christ
2703 Brittany Rd.
Albany, GA 31721

OFFICE OF THE JURISDICTIONAL PRELATE

16 January 2023

MEMORANDUM FOR RECORD

SUBJECT: Elder Kenneth Watts

I certify that Elder Kenneth Watts, Pastor of Westside Ministry Inc., Church of God in Christ, and parishioners located at 51 Marshall Lane, Pensacola, FL 32505 are active members of Western Georgia Ecclesiastical Jurisdiction, Church of God in Christ.

Kindly contact me at (229) 436-8500 in case you have any questions about him.

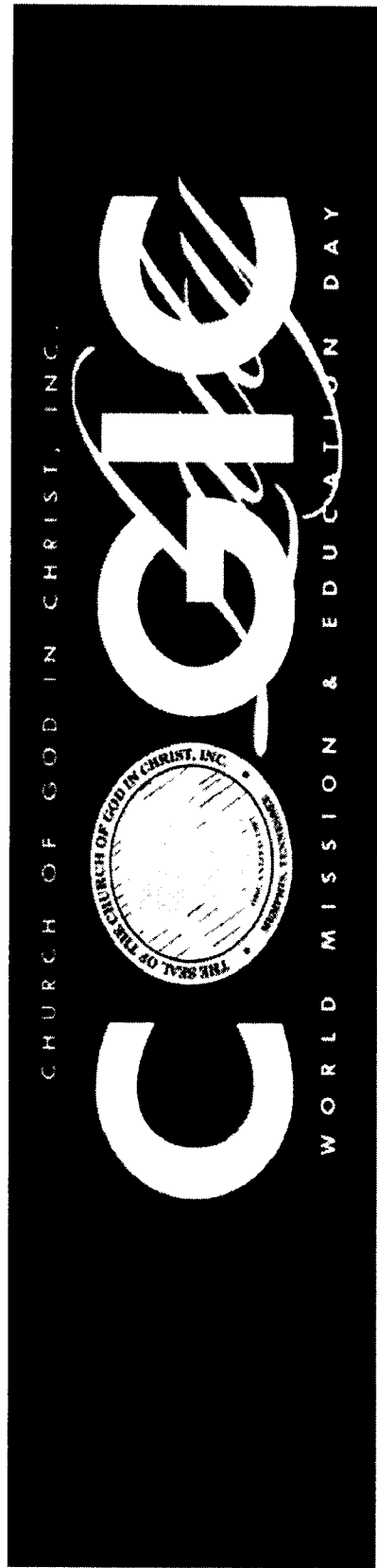
John F. Thomas

//Original Signed//

Bishop John F. Thomas

Jurisdictional Prelate

Western Georgia, Church of God in Christ



DASHBOARD
G OUT

No
Photo
Available
2/12

WELCOME MR. KENNETH WATTS, SR

Current Status: ACTIVE

Title: MR.

Jurisdiction: GEORGIA WESTERN

Member of: Westside Ministry | Edit

Contact Information | Edit

51 Marshall Lane Pensacola, FLORIDA 32505 United States

Home: 0 - - United States

Cell: (850) 375-7300 - United States

FY Assessment: | History
District: Eufaula District 1

Background Check: Completed 07/22/2022 **Misconduct:** Completed 06/16/2022



APPLICATIONS
GENERAL ONLINE APPLICATIONS



BACKGROUND CHECK



CLASSES/TRAININGS
LINKS TO CERTS, ORDERED VIDEOS, ETC



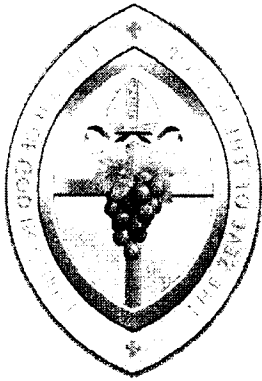
E-STORE



E-TRAIN



LAIY YES LORD



Board of Bishops
Church Of God In Christ

Office of the Secretary

Bishop William H. Watson, III

August 22, 2022

VIA Email

Superintendent U. L. Johnson
7911 Kershaw St
Pensacola, Florida 32534
anewpastor@aol.com

Re: Superintendent U. L. Johnson vs Bishop Willie C. Green
Case No. 2022-WG-0822

Dear Superintendent Johnson:

Greetings in the Name of our Lord & Savior Jesus Christ! I write concerning the your complaint submitted to the Board of Bishops against Bishop Willie C. Green, Responding Party. Please be notified that the First Vice Chairman and I have reviewed the complaint and determined that you have met the requirements of Board of Bishops Rule of Trial Procedure No. 3, sections a-d. Therefore, pursuant to Rule of Trial Procedure No. 4, this matter is being delivered to the Grievance Committee by copy of this letter to Bishop Roy Dixon for a just cause determination. Under the Rules of Trial Procedure the Grievance Committee has 180 days to make its determination unless it request and is granted an extension of time by the Board of Bishops.

The assigned case number for this petition will be Case No. 2022-WG-0822. By copy of this letter and the attachments, I am also forwarding a copy of the complaint and the Board of Bishops Rules of Trial Procedure to the Responding Party. You should familiarize yourself with these rules. If you have any questions or concerns, please contact me at (806) 438-2323.

Yours in His Service,

/s/

Bishop William H. Watson, III
Secretary of the Board of Bishops

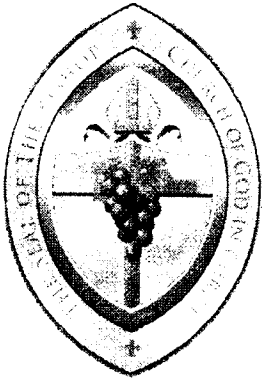
Cc: Bishop Willie C Green

Bishop Albert Galbraith, Chairman of the Board of Bishops

Bishop Roger Jones, 1st Vice Chairman of the Board of Bishops

Bishop Roy Dixon, Chairman of the Grievance Committee of the Board of Bishops

C. Edward Watson, II, Counsel for the Board of Bishops



Board of Bishops
Church Of God In Christ

Office of the Secretary

Bishop Adrian D. Williams, Assistant Secretary

October 20, 2022

VIA Email

Elder Kenneth Faison
140 Pennbrooke Loop
Foley, Alabama 36535
kencares4u@yahoo.com

Re: Case
Case No. 2022-WG-1020

Dear Elder Faison

Greetings in the Name of our Lord & Savior Jesus Christ! I write concerning the complaint submitted to the Board of Bishops against Bishop Willie C. Green, Responding Party. Please be notified that the First Vice Chairman, Second Vice Chairman and I have reviewed the complaint and determined that you have met the requirements of Board of Bishops Rule of Trial Procedure No. 3, sections a-d. Therefore, pursuant to Rule of Trial Procedure No. 4, this matter is being delivered to the Grievance Committee by copy of this letter to Bishop Roy Dixon for a just cause determination. Under the Rules of Trial Procedure, the Grievance Committee has 180 days to make its determination unless it requests and is granted an extension of time by the Board of Bishops.

The assigned case number for this petition will be Case No. 2022-WG-1020. By copy of this letter and the attachments, I am also forwarding a copy of the complaint and the Board of Bishops Rules of Trial Procedure to the Responding Party. You should familiarize yourself with these rules. If you have any questions or concerns, please contact me at (404) 386-6262

Yours in His Service,

/s/

Bishop Adrian D. Williams
Assistant Secretary of the Board of Bishops

Cc: Bishop Willie Green

Bishop Albert Galbraith, Chairman of the Board of Bishops

Bishop Roger Jones, 1st Vice Chairman of the Board of Bishops

Bishop William Watson, 2nd Vice Chairman of the Board of Bishops

Bishop Roy Dixon, Chairman of the Grievance Committee of the Board of Bishops

C. Edward Watson, II, Counsel for the Board of Bishops