

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF TENNESSEE WESTERN DIVISION**

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**CHURCH OF GOD IN CHRIST, INC.**  
**individually, and;**

**BOARD OF DIRECTORS also known as  
GENERAL BOARD OF CHURCH OF  
GOD IN CHRIST, INC.**

**JONATHAN SAFFOLD, JR., individually and as  
GENERAL COUNSEL OF CHURCH OF  
GOD IN CHRIST, INC.**

**Plaintiffs,**

**vs.**

**No:**

**MOSES TYSON, JR.**

**Defendant.**

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**COMPLAINT FOR DAMAGES**

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**I. INTRODUCTION**

1. This action arises from a series of false, defamatory, and malicious statements made by Defendant Moses Tyson, Jr., who has engaged in a campaign of slander, libel, and threats directed against the Church of God in Christ, Inc. (“COGIC”), its senior clergy, and local leadership in connection with the lawful transition of leadership at Holy Tabernacle Church in Texas.

2. Defendant’s communications—including widely disseminated emails, social media postings, and video publications—falsely accuse Plaintiffs of fraud, grand theft, elder abuse, and other crimes, with the intent to damage reputations, undermine COGIC’s governance, and incite disruption among affiliated congregations.

## **II. JURISDICTION AND VENUE**

3. This Court has jurisdiction under 28 U.S.C. § 1332 (diversity jurisdiction) because the matter in controversy exceeds \$75,000 and involves citizens of different states. Plaintiffs are citizens of Tennessee and Texas; Defendant is a citizen of the State of California.

4. Venue is proper in the Western District of Tennessee pursuant to 28 U.S.C. § 1391(b) because COGIC is headquartered in Memphis, Tennessee, and a substantial part of the events causing harm occurred in this District.

## **III. PARTIES**

5. Plaintiff, Church of God in Christ, Inc. (“COGIC”) is a Tennessee nonprofit religious corporation headquartered and residing in Memphis, Tennessee

6. Plaintiff, General Board Of Church Of God In Christ, Inc. is the presiding board, of COGIC. It functions under the COGIC Constitution, particularly Article III, Section B, which establishes the General Board as the Executive Branch of the church's government.

7. and resides in Memphis Tennessee, with national responsibilities headquartered in Memphis, Tennessee.

8. Plaintiff, Jonathan Saffold, is General Counsel of COGIC, Inc., and resides in Milwaukee, Wisconsin.

9. Defendant Moses Tyson, Jr. is an individual residing in Sacramento, California, who has, at all relevant times, engaged in a pattern of defamatory conduct directed toward Plaintiffs.

## **IV. FACTUAL ALLEGATIONS**

10. In or about August, 2025 through the present, Defendant authored and disseminated multiple emails, Facebook posts, and online videos making knowingly false statements about COGIC leadership and the transition of Bishop Robert L. Sample to Emeritus status.

11. Defendant falsely asserted, among other things:

- a) That COGIC leadership, including the General Board Of Church Of God In Christ, Inc. and engaged in “fraud,” “grand theft,” and “elder abuse,” against Bishop Robert L. Sample.
- b) That COGIC allowed Jurisdictional Bishop, namely, Bishop John Drew Sheard and General Board Bishop Charles H. McClelland to “steal properties and money” and “lie to the courts.”
- c) That COGIC allowed Elder Perry Williams’ lawful installation as replacement Pastor for Robert L. Sample was “illegal” and constituted exploitation of Bishop Robert L. Sample.
- d) That COGIC officials have committed crimes and would soon be arrested, wear “orange suits,” and be imprisoned at Rikers Island Penitentiary.

12. Defendant published these falsehoods to dozens of national officers, local clergy, and church members across the United States, including by mass email, broad CC lists, and social media postings accessible to thousands.

13. Defendant’s statements are defamatory per se, as they accuse Plaintiffs of criminal activity, dishonesty, and abuse of elderly persons.

14. Defendant has also engaged in tortious interference by:

- a) Urging congregations to amend bylaws to sever ties with COGIC;
- b) Threatening to bring law enforcement into COGIC churches to remove duly appointed leadership;
- c) Calling for public rallies and campaigns designed to undermine COGIC’s governance .

15. Defendant acted with actual malice, knowing his statements were false or recklessly disregarding the truth.

16. Plaintiffs have suffered severe national reputational, organizational, and economic harm, including erosion of confidence in leadership, disruption of congregational relationships, and damages exceeding \$500,000.

## **V. CAUSES OF ACTION**

### **COUNT I – Defamation (Per Se & Per Quod Against All Plaintiffs)**

17. Plaintiffs repeat and reallege the preceding paragraphs.

18. Defendant made false statements of fact concerning Plaintiffs.

19. The statements were published to third parties.

20. The statements are defamatory per se, as they allege crimes and dishonesty in Plaintiffs' professions.

21. Plaintiffs have been damaged by Defendant's defamatory conduct.

### **COUNT II – Tortious Interference with Business and Church Relations (Against COGIC, Bishop Sheard, Bishop McClelland, and Pastor Williams)**

22. Defendant intentionally and improperly interfered with Plaintiffs' existing relationships with congregations and stakeholders.

23. Defendant sought to induce congregations to break ties with COGIC and to reject duly appointed leadership.

24. Defendant's actions caused harm to Plaintiffs' contractual and business expectancies.

### **COUNT III – False Light / Invasion of Privacy (Against All Plaintiffs)**

25. Defendant publicized statements that placed Plaintiffs in a false light offensive to a reasonable person.

26. Defendant acted with knowledge or reckless disregard of falsity.

**COUNT IV – Civil Conspiracy (if evidence supports coordination)**

27. Defendant conspired with others to damage COGIC and its leaders through coordinated defamation, threats, and interference.

**VI. PRAYER FOR RELIEF**

**WHEREFORE, Plaintiffs respectfully request** that this Court enter judgment in their favor and against Defendant as follows:

- A. Awarding compensatory damages in an amount exceeding **\$500,000**, to be determined at trial;
- B. Awarding punitive damages for Defendant's malicious conduct;
- C. Issuing injunctive relief prohibiting Defendant from further defaming Plaintiffs or interfering with church governance;
- D. Awarding costs, attorney's fees, and such other relief as the Court deems just and proper.

Respectfully submitted,

**/s/Taurus Bailey**

**Taurus Bailey #24303**

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