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October 8, 2025

Via Email and Certified Mail

Mr. Moses J. Tyson Jr.

**Re: Final Cease and Desist Demand – Defamatory, Malicious, and Threatening
Conduct Toward the Church of God in Christ, Inc. and its National Leadership**

Dear Mr. Tyson:

This office represents the Church of God in Christ, Inc. (“COGIC”), together with its General Board (the duly elected executive branch of the Church’s national government) and General Counsel, Attorney Jonathan Saffold, Jr.

It has come to our attention that, from approximately August 2025 to the present, you have engaged in a sustained campaign of false, defamatory, and threatening communications concerning COGIC and its officers. These communications have included emails, Facebook posts, and video publications circulated to church leaders and the general public, in which you have falsely accused COGIC and its officials—including Presiding Bishop J. Drew Sheard and Bishop Charles H. McClelland—of fraud, grand theft, elder abuse, and criminal misconduct in relation to the transition of Bishop Robert L. Sample to Emeritus status at Holy Tabernacle Church in Texas.

Your statements further allege that national leaders will “wear orange suits” and “be imprisoned at Rikers Island,” that COGIC officials have “lied to the courts,” and that congregations should “amend bylaws” to withdraw from COGIC and defy duly appointed

pastors. These statements are demonstrably false, defamatory per se, and calculated to inflict reputational and organizational harm.

Your conduct has caused measurable injury to the Church, including disruption of congregational relations, confusion among clergy, and damage to national goodwill. You have also encouraged others to interfere with COGIC's lawful governance, constituting tortious interference and civil conspiracy.

FORMAL DEMAND

1. Publishing or disseminating any further false, misleading, or threatening statements—whether in writing, verbally, or via electronic or social-media platforms—regarding the Church of God in Christ, its officers, or its affiliated congregations;
2. Communicating with or attempting to influence any COGIC clergy, congregations, or members for the purpose of discrediting, undermining, or interfering with COGIC's lawful ecclesiastical and corporate operations;
3. Inducing or encouraging others to engage in any conduct described above.

NOTICE OF LEGAL ACTION

Please be advised that your actions constitute defamation (libel and slander), tortious interference with church and business relations, and false light invasion of privacy. These matters are set forth in the draft federal complaint prepared for filing in the United States District Court for the Western District of Tennessee. Unless you provide written assurance of immediate compliance within five (5) business days, my office is authorized to file that complaint seeking:

- Compensatory damages exceeding \$500,000,
- Punitive damages for malicious conduct, and
- Injunctive relief prohibiting you from further defamatory or disruptive actions.

RESERVATION OF RIGHTS

Nothing in this correspondence shall be construed as a waiver of any rights or remedies available to the Church of God in Christ, Inc., its General Board, or its officers, all of which are expressly reserved.

Respectfully,


/s/ Taurus Bailey

Taurus Bailey, Esq. (Tenn. Bar #24303)
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Enclosure: Draft Federal Complaint for Damages – Church of God in Christ, Inc. et al. v.
Moses Tyson, Jr.