

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

**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,

v.

No. _____

MOSES TYSON, JR.,

Defendant.

RECEIVED

NOV 10 2025

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Memphis

**NOTICE OF REMOVAL
(SUBJECT TO AND WITHOUT WAIVING DEFENDANT'S MOTION TO
DISMISS FOR LACK OF JURISDICTION)**

TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION:

Comes now Defendant, **MOSES TYSON, JR.**, pro se, and pursuant to 28
U.S.C. §§ 1441, 1446, and 1332, hereby gives notice of the removal of this action

from the Chancery Court of Tennessee for the Thirtieth Judicial District of Shelby County, Memphis, Tennessee to the United States District Court for the Western District of Tennessee, Western Division. This case is removable pursuant to 28 U.S.C § 1441(a) because this is a civil action in which the District Courts of the United States have been given original jurisdiction, specifically federal diversity jurisdiction, under 28 U.S.C § 1332. As will be discussed below, the amount in controversy exceeds \$75,000.00 exclusive of interest and costs, and there is complete diversity between plaintiffs and defendant in this action.

As grounds for removal, Defendant would state as follows:

1. On October 31, 2025, a Complaint was filed against Defendant in the Chancery Court of Tennessee for the Thirtieth Judicial District in and for Memphis, Tennessee. The Summons and Complaint were served upon Defendant, MOSES TYSON, JR. on November 5, 2025. *See Summons in Civil Action at Document 1-3.*

2. Plaintiff, **CHURCH OF GOD IN CHRIST, INC.** is a Tennessee non-profit, ecclesiastical corporation organized under the laws of the state of Tennessee, with its headquarters and principal place of business in Memphis, Tennessee. *See Complaint at Document 1-2, ¶ 6.*

3. Plaintiff, **BOARD OF DIRECTORS also known as the GENERAL BOARD OF CHURCH OF GOD IN CHRIST, INC.** also known as THE

GENERAL BOARD and BOARD OF BISHOPS are the senior governing bodies and agents of Plaintiff, CHURCH OF GOD IN CHRIST, INC. *See Complaint at Document 1-2, ¶ 7.* The General Board of the Church of God in Christ, Inc is responsible for establishing and executing policies for the membership, as well as sustaining and perpetuating spiritual order within the Church with its headquarters and/or principle place of business located at 930 Mason Street, Memphis, Tennessee, 38126.

4. Plaintiff, **BISHOP JOHN DREW SHEARD** is the duly elected Presiding Bishop of Plaintiff, CHURCH OF GOD IN CHRIST, INC. and as such is an agent thereof and is also a resident of the state of Tennessee. *See Complaint at Document 1-2, ¶ 8.* Without waiving the foregoing, upon information belief, Plaintiff, **BISHOP JOHN DREW SHEARD** may also reside in the state of Michigan.

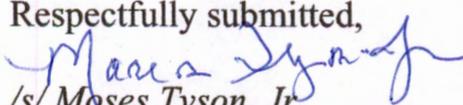
5. Plaintiff, **JONATHAN SAFFOLD, JR.** is the general counsel of Plaintiff, CHURCH OF GOD IN CHRIST, INC. and as such is an agent thereof and is also a resident of the state of Tennessee. *See Complaint at Document 1-2, ¶ 7.* See also *Plaintiff's Brief in Support of Preliminary Injunction at Document 1-4, Exhibit 8.* Without waiving the foregoing, upon information belief, Plaintiff, **JONATHAN SAFFOLD, JR** may also reside in the state of Wisconsin.

6. Defendant, **MOSES TYSON, JR.** is a citizen and resident of the state of California.

7. The Plaintiffs seek an award of “Compensatory Damages to all Plaintiffs of \$500,000, (FIVE HUNDRED THOUSAND DOLLARS) an amount sufficient to compensate for injuries ...” (*See Complaint at Document 1-2, § VI – B*) in addition to an award of “Punitive Damages” (*See Complaint at Document 1-2, § VI – C*).

8. Accordingly, because complete diversity exists and the amount in controversy exceeds \$75,000.00 exclusive of interest and costs, 28 U.S.C. § 1332 affords this Honorable Court diversity jurisdiction of this action, and 28 U.S.C. § 1441 authorizes Defendant to remove this action to this Court.

9. In accordance with the provisions of 28 U.S.C. § 1446, copies of all process and pleadings received by Defendant in this action are attached hereto; written notice of the filing of this Notice of Removal will be given to counsel for Plaintiffs, and a copy of the Notice of Removal will be filed with the Clerk of the Chancery Court of Tennessee for the Thirtieth Judicial District of Shelby County in, for and at Memphis, Tennessee.

Respectfully submitted,

/s/ Moses Tyson, Jr.

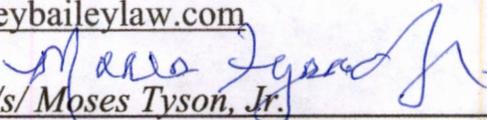
MOSES TYSON, JR., Pro se
1660 McAllister Street,

San Francisco, CA 94115
Email: molestysonjr@hotmail.com

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2025, a true and correct copy of the foregoing document(s) was/were serviced via e-mail, the Court electronic case management system and/or U.S. Mail, postage prepaid, on the following:

Taurus Bailey
BAILEY & BAILEY, PLLC
Formerly, THE WALTER BAILEY LAW FIRM
44 North Second Street, Suite 502
Memphis, TX 38103
Email: taurus@baileybaileylaw.com


/s/ Moses Tyson, Jr.
MOSES TYSON, JR., Pro se

CIVIL COVER SHEET

PageID 6

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Church of God in Christ, Inc; Board of Directors - General Board of Church of God in Christ; Jonathan Saffold, Jr.

(b) County of Residence of First Listed Plaintiff Shelby County, TN (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Taurus Bailey, Bailey & Bailey, PLLC, 44 North Second Street, Suite 502, Memphis, TX 38103, 901-575-8702

DEFENDANTS

Moses Tyson, Jr.

County of Residence of First Listed Defendant San Francisco, CA (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Pro se, San Francisco, CA, 1660 McAllister St, San Francisco, CA 94115, mosestysonjr@hotmail.com

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF, DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories and codes.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332. Brief description of cause: Defamation Per Se; Libel, Slander, False Light, Tortious Interference, Invasion of Privacy, Civil Conspiracy

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 500,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE Nov 10, 2025 SIGNATURE OF ATTORNEY OF RECORD /s/ Moses Tyson, Jr., Pro se

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

STATE OF TENNESSEE 30th JUDICIAL DISTRICT CHANCERY COURT	SUMMONS**	DOCKET NUMBER CH- _____
Plaintiff <u>Church of God in Christ Inc,</u> <u>Board of Directors;</u> <u>Jonathan Saffold, Jr.</u>		Defendant <u>Moses J. Tyson, Jr.</u>
TO: (NAME AND ADDRESS OF DEFENDANT) <u>Moses J. Tyson Jr.</u> <u>1419 Lassen St.</u> <u>Vallejo, CA 94591</u>		Method of Service: <input type="checkbox"/> Shelby County Sheriff <input checked="" type="checkbox"/> Private Process Server <input type="checkbox"/> Out of County Sheriff <input type="checkbox"/> Secretary of State <input type="checkbox"/> Comm. Of Insurance <input type="checkbox"/> Certified Mail <input type="checkbox"/> Other *Attach Required Fees
OCT 31 2025 NOT FOR SERVICE OR RETURN USE		
You are summoned to defend a civil action filed against you in the Chancery Court of Shelby County, Tennessee. Your defense to this action must be made within thirty (30) days from the date this summons is served upon you. You must file your defense with the Clerk of the Court and send a copy to the Plaintiff/Plaintiff's attorney at the address listed below. If you fail to defend this action within thirty (30) days of service, judgment by default may be rendered against you for the relief sought in the complaint. Questions regarding this summons and the attached documents should be addressed to the Attorney/Plaintiff listed below.		
Attorney for Plaintiff or Plaintiff if filing Pro Se: (Name, address & telephone number) <u>Taurus Bailey, Atty</u> <u>44 N. 2nd St.</u> <u>Suite 502</u> <u>Memphis, TN 38103</u>	ISSUED <u>31</u> of <u>October</u> , 20 <u>25</u> W. Aaron Hall, Clerk and Master By: <u>[Signature]</u> Deputy Clerk & Master 140 Adams, Room 308 Memphis, TN 38103	
TO THE SHERIFF: _____ _____	Came to hand _____ day of _____, 20____ Sheriff	
CERTIFICATION (IF APPLICABLE)		
I, W. Aaron Hall, Clerk & Master of the Chancery Court in the State of Tennessee, Shelby County, do certify this to be a true and correct copy of the original summons issued in this case.	W. Aaron Hall, Clerk & Master By: _____ D.C.A.M.	

**Submit one original and one copy for each defendant to be served.

For Americans with Disabilities Act (ADA) assistance only, please call Shelby County ADA Coordinator at (901) 222-2334. For questions regarding scheduling or filing, please contact Chancery Court at (901) 212-3800.

Notice of Personal Property Exemption:

TO THE DEFENDANT(S):

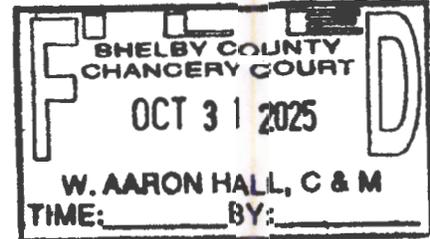
Tennessee law provides a ten thousand dollar (\$10,000.00) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunk or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state docket number on list.

**IN THE CHANCERY COURT FOR THE THIRTIETH
DISTRICT OF SHELBY COUNTY, TENNESSEE**

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.

MOSES TYSON, JR.

Defendant.

No: CH-25-1651
Part I

COMPLAINT FOR DAMAGES AND FOR INJUNCTION

I. INTRODUCTION

1. This is an action for damages and **urgent equitable relief**, including a Temporary Restraining Order and Permanent Injunction, arising from a malicious, nationwide campaign of libel and slander orchestrated and executed by Defendant MOSES TYSON, JR., against the Plaintiffs: the Church of God in Christ, Inc. (COGIC), its General Board, its Board of Bishops, its Presiding Bishop, BISHOP JOHN DREW SHEARD, and its General Counsel, JONATHAN SAFFOLD, JR.

2. Defendant Tyson has repeatedly and widely published demonstrably false statements in emails, on social media, and in video broadcasts, **recklessly and knowingly accusing the**

Plaintiffs of severe felonious crimes including Grand Theft, Fraud, and Elder Abuse—
accusations which are baseless and designed to inflict maximum harm.

3. These actions constitute **defamation per se** under Tennessee law, causing immediate, devastating, and irreparable injury to the national ecclesiastical and charitable reputation of the Plaintiffs, thereby jeopardizing the pious mission, membership, and the essential flow of charitable donations of this worldwide religious organization. The continuing nature of the publications necessitates the immediate intervention of this Court, as a court of equity, to protect Plaintiffs' reputations and mission.

II. JURISDICTION AND VENUE

4. This Court, being a court of equity, has subject matter jurisdiction over this civil action pursuant to T.C.A. § 16-11-102, possessing the authority to grant both legal damages and equitable remedies, including injunctions, necessary to prevent ongoing, irreparable harm.

5. Venue is proper in the Chancery Court of Shelby County, Tennessee, pursuant to T.C.A. § 20-4-101(a), as COGIC, Inc. is a Tennessee corporation with its principal place of business in Memphis, Shelby County, Tennessee. The Defendant's publications are intentionally directed into this State and County, and the resulting, continuous, and highly damaging injury to the Plaintiffs' reputation, charitable fundraising, and business operations is centralized and incurred within this County and State.

III. PARTIES

6. Plaintiff **CHURCH OF GOD IN CHRIST, INC. (COGIC)** is a non-profit, ecclesiastical corporation organized under the laws of the State of Tennessee, with its headquarters in Memphis, Tennessee.

7. Plaintiffs **THE GENERAL BOARD and BOARD OF BISHOPS** are the senior governing bodies of COGIC, whose collective, unimpeachable reputations are foundational to the credibility, spiritual authority, and effective function of the denomination.

8. Plaintiff **BISHOP JOHN DREW SHEARD** is the duly elected Presiding Bishop of COGIC, whose personal reputation is inextricably linked to the spiritual and corporate reputation of the entire organization.

9. Plaintiff **JONATHAN SAFFOLD, JR.** is the General Counsel of COGIC, and has been personally and professionally defamed by the Defendant, damaging his standing as an officer of the court and counsel to a national organization.

10. Defendant **MOSES TYSON, JR.**, is a citizen of the State of California, who purposefully transacts business and directs his malicious, defamatory publications into the State of Tennessee, where the Plaintiffs reside and are headquartered, causing direct and foreseeable harm.

IV. FACTS

11. COGIC, as a worldwide religious organization, relies entirely upon the piety, moral authority, integrity, and good reputation of its leaders to maintain its ecclesiastical authority, retain its membership base, and secure the generous flow of charitable donations from its members and families.

12. Beginning on or about August 2025, and continuing relentlessly to the present, Defendant Tyson commenced a widespread, malicious, and damaging campaign of false communications.

13. Defendant's publications were disseminated nationally and internationally via mass emails, YouTube videos, and social media postings, ensuring the defamatory statements reached vast numbers of individuals, including COGIC members, clergy, and the general public.

14. The core of Defendant Tyson's false campaign involves **reckless allegations of serious, felonious crimes**. Specifically, Defendant has repeatedly accused Plaintiffs, including Bishop John Drew Sheard and other bishops, of being **"thieves,"** engaging in **"grand theft,"** and committing **"elder abuse"**—allegations that are demonstrably false, deeply criminal in nature, and constitute the most damaging form of defamation.

15. In one particular email published and broadcast to recipients nationwide, entitled "Moses Tyson's email," Defendant went further by referring to Plaintiffs, including Presiding Bishop Sheard and Superintendent Jones, as having **"groupies,"** a statement designed to intentionally slander their moral, ecclesiastical, and professional character, thereby damaging their pastoral credibility.

16. Defendant Tyson's statements are not expressions of mere opinion; they are reckless allegations of verifiable facts concerning criminal activity that Defendant knew or should have known were false. Defendant has acted without any modicum of good faith belief in the truth of his statements.

17. The publications are profoundly damaging to Plaintiffs' reputations, as the integrity of the Board of Bishops and the corporate structure is necessary for the spiritual stability and smooth operation of the entire organization, from the national corporation down to the jurisdiction and district levels.

18. The Defendant's pervasive activities on YouTube have amplified his malicious message, repeatedly accusing the Plaintiffs and the organization's leadership of felonious ~~and~~ criminal activities, resulting in ongoing, irreparable reputational and financial harm.

19. Defendant's repeated invocation of the COGIC brand, insignia, and ecclesiastical authority in his defamatory broadcasts has created the false appearance of an internal Church

investigation or sanctioned communication. These misrepresentations have caused confusion among COGIC members, pastors, and the public, leading to reputational harm and dilution of COGIC's goodwill as a globally recognized religious body headquartered in Memphis, Tennessee.

V. CAUSES OF ACTION

COUNT I - DEFAMATION (LIBEL AND SLANDER) (Against All Plaintiffs)

20. Defendant Moses Tyson, Jr., published false statements of fact concerning the Plaintiffs.
21. The statements were published to third parties, including via mass emails and YouTube broadcasts nationwide, with the requisite fault, specifically **actual malice** or a reckless disregard for the truth.
22. The statements constitute **Defamation Per Se** because they clearly and unequivocally accuse Plaintiffs, including Bishop Sheard and General Counsel Saffold, of criminal activity (theft, fraud, and elder abuse) and/or professional dishonesty in their respective vocations as ecclesiastical leaders and legal counsel.
23. Under Tennessee law, where defamation per se is established, Plaintiffs are entitled to a presumption of injury to reputation.
24. The statements have injured the reputations of Bishop Sheard and the other Plaintiffs, undermined the public trust in COGIC, and directly interfered with its mission and ability to secure charitable contributions, necessitating both damages and injunctive relief.

COUNT II - FALSE LIGHT / INVASION OF PRIVACY (Against All Plaintiffs)

25. Defendant publicized statements that placed Plaintiffs in a false light that would be highly offensive to a reasonable person, including the false association with felonious criminal conduct and low moral character ("groupies").

26. Defendant acted with knowledge of the falsity or with reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiffs would be placed.

27. The false light created by Defendant's ongoing campaign has resulted in severe emotional distress and irreparable harm to the Plaintiffs' standing in the religious and professional communities.

**COUNT III - TORTIOUS INTERFERENCE WITH CHARITABLE AND
ECCLESIASTICAL RELATIONS
(Against COGIC, The General Board, and Board of Bishops)**

28. Plaintiffs possess highly valuable and protected charitable and ecclesiastical relationships, including their critical relationship with their constituent jurisdictions, districts, and local congregations, as well as with their national base of donors and charitable benefactors.

29. Defendant, acting intentionally and improperly, published defamatory statements aimed at inciting congregations and donors to break ties with COGIC and to reject the spiritual and administrative authority of its duly appointed officials.

30. Defendant's malicious and wrongful conduct has caused actual damage by disrupting existing relationships, dissuading charitable donations, and severely interfering with the operation of the church, including but not limited to the ability to lawfully transition leadership and maintain denominational order.

COUNT IV - CIVIL CONSPIRACY (If evidence supports coordination)

31. Defendant conspired with others to damage COGIC and its leaders through coordinated, nationwide defamation, threats, and interference with the governance of the organization.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court, in the exercise of its equity powers, enter judgment in their favor and against Defendant as follows:

A. ISSUING IMMEDIATE AND PERMANENT INJUNCTIVE RELIEF:

- i. Granting a Temporary Restraining Order (TRO) and Preliminary Injunction** forthwith, enjoining and restraining Defendant Moses Tyson, Jr., and all persons acting in concert with him, from publishing, broadcasting, or disseminating any further defamatory statements, including any references to "thieves," "grand theft," "elder abuse," "fraud," "groupies," or any other statement of similar defamatory import, against the Church of God in Christ, its General Board, Board of Bishops, Presiding Bishop John Drew Sheard, General Counsel Jonathan Saffold, Jr., or any other COGIC leader.
- ii. Granting a Permanent Injunction** upon final disposition of this matter, making the terms of the Preliminary Injunction permanent.

B. Awarding Compensatory Damages to all Plaintiffs of \$500,000, (FIVE HUNDRED THOUSAND DOLLARS) an amount sufficient to compensate for injuries to reputation, business, and emotional distress, including but not limited to the measurable loss of charitable contributions, or in an amount to be determined at trial.

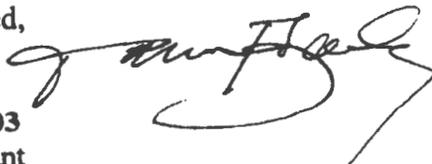
C. Awarding Punitive Damages for Defendant's malicious, willful, and reckless conduct.

D. Awarding Costs, including reasonable Attorney's Fees, as allowable under Tennessee law.

E. Awarding such other and further relief as the Court deems just and proper in law and equity.

Respectfully submitted,

/s/Taurus Bailey
Taurus Bailey #24303
Attorney for Defendant
44 N. Second Street, Suite 502
Memphis, TN 38103
(901) 575-8702 x. 3



STATE OF FLORIDA

COUNTY OF GADSDEN

AFFIDAVIT IN SUPPORT OF COGIC IN OPPOSITION TO MOSES TYSON, JR

BEFORE ME, the undersigned authority, personally appeared, WILLIE C. GREEN, who upon being duly sworn states the following of his own personal knowledge:

1. My name is Willie C. Green. I live at 296 Bradwell Road, Quincy, Florida 32351.
2. I am over the age of eighteen.
3. I am giving this Affidavit in support of the Church of God in Christ (COGIC) and in opposition to Moses Tyson, Jr.
4. I am a member of COGIC's Board of Bishops (BOB), serving as the Jurisdictional Bishop of The Ecclesiastical Jurisdiction of Florida Northwest COGIC, Inc. with churches in North Florida and South Alabama.
5. I pastor Quincy and Community Deliverance COGIC, Inc. in Quincy, Florida and Easthill COGIC, Inc. in Pensacola, Florida.
6. I have personal knowledge about the facts in the case being brought against Moses Tyson, Jr. by COGIC.
7. Mr. Tyson copied me on some of the text messages, emails, and videos that he published on social media accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing crimes including "being thieves", "grand theft", "fraud", and "elderly abuse". He also published some of these statements on a platform known as "King Live's".

8. I read and/or heard Mr. Tyson making statements accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing the crimes listed above.
9. I have personal knowledge that pastors, members, and other people in my jurisdiction and local church have seen and heard the above statements made by Mr. Tyson accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing the crimes listed above.
10. Based on my personal knowledge, membership and income in my local churches and jurisdiction have declined as a result of the above statements made by Mr. Tyson.
11. Some members and visitors to my church have told me that they left or will not come back as a result of the statements made by Mr. Tyson. Others have stated that they have a negative view of COGIC and Bishop Sheard as a result of Mr. Tyson's statements.
12. One of my members, who lives in Lakeland, called and told me that he had seen the statements made by Mr. Tyson and that they gave him a negative view of COGIC and Bishop Sheard.
13. One person, who was a frequent visitor and supporter of my church, told me that she will not attend any more COGIC functions because she does not trust Bishop Sheard.
14. Other pastors in Florida have reported to me that Mr. Tyson's statements about COGIC have caused declines in their church attendance and membership.

I understand that I am swearing or affirming under oath and under penalty of perjury to the truthfulness of the claims that I have made in this Affidavit.

I affirm or swear that all of the above statements are true to the best of my knowledge.

Done this 26th Day of October 2025

Willie C Green

Signature

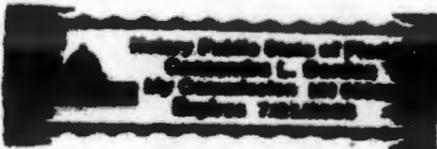
Willie C Green
Printed Name

STATE OF FLORIDA

COUNTY OF GADSDEN

The Foregoing instrument was acknowledged before me this 26th day of October 2025 by

Willie C. Green, X who is personally known to me ___ or who produced Driver's License
as identification.



Cassandra L Gordon

Signature of Notary Public

Cassandra L Gordon

Notary Public

Commission - HH 565803
My Commission expires 07/21/2028

PASTOR MOSES TYSON PRESENTS

INFORMATION SESSIONS

LOCATION TO BE
ANNOUNCED

LORD, SOMEONE HAS TO
PROTECT THEM... HERE
AM I, SEND ME!

RECOGNIZE FRAUD, REJECT IT & REPORT IT!

From: Jonathan Saffold jsaffold@cgic.org
Subject: Fwd: ATTORNEY BAILEY: I WILL "NOT" BE SILENT AS TO THE FRAUD, ABUSE & GRAND THEFT RELATED TO COGIC CASES I HAVE BEEN INVOLVED WITH! FILE YOUR LAWSUIT IF YOU DESIRE!
Date: October 24, 2025 at 10:15 PM
To: Taurus Bailey tbaileylawoffice@gmail.com

JS

----- Forwarded message -----

From: **Moses Tyson Jr** <mosestysonjr@hotmail.com>
Date: Fri, Oct 24, 2025, 22:09
Subject: ATTORNEY BAILEY: I WILL "NOT" BE SILENT AS TO THE FRAUD, ABUSE & GRAND THEFT RELATED TO COGIC CASES I HAVE BEEN INVOLVED WITH! FILE YOUR LAWSUIT IF YOU DESIRE!
To: Jay Bailey <javierbailey@gmail.com>
Cc: Bishop Drew Sheard <jsh5948740@aol.com>, Jonathan Saffold <jsaffold@cgic.org>

<https://youtu.be/E-1BshC52dE?si=IPJ-uAtENTHvbO98> (CLICK ON LINK TO SEE MOSES TYSON & ELDER SCONNIERS INTERVIEW RE COGIC)!!!!

Dear Mr. Bailey:

I pray you are well. Sir, I have attached the draft of a "lawsuit & threatening letter" from the CEO/ PRESIDING BISHOP, GEN BOARD & GEN COUNSEL SAFFOLD, as it relates to the factual statements I made regarding Bishop Sample's matter. Please be advised sir, that I will NOT be intimidated into being silent as the "ABUSE" that Bishop Sheard and his "sycophants" are yet engaging in against him and the local church corporation that he is yet the LEGAL PRESIDENT & PASTOR OF, "HOLY TABERNACLE COGIC" in Fort Worth.

Now please be advised that I have already retained an attorney in Fort Worth, as a result of Bishop Sheard and others, basically "LYING" to the police there, telling them that Bishop Sample was NOT the Pastor, when I went with him to the church a few weeks ago. Bishop Sample asked me to go into his office with him, and was "DENIED" by the Office Manager & Elder Williams, who Bishop Sheard, Bishop McClelland and others are "LYING" saying he is the PASTOR. That is a LIE sir, and frankly I am tired of them LYING ON ME, in courts and to police stations. COGIC INC, Officials told the same type of LIES, in Houston, in the Bishop Kyles matter, of which they are yet engaging in "FRAUD & ABUSE", denying him to carry out his duties as the LEGAL PRES of Evangelist Temple. BUT for Bishop Sheard's "CUT UP & PASTED FRAUDULENT LETTER", to ET, after the Board of Bishops, "RULED" Bishop Kyles was due his reinstatement letter as Pastor, Jan 2020: The matter would have been over with.

I have attached a recent interview I gave with Elder Sconniers. I am preparing to do a "SOCIAL MEDIA" TOUR soon, so our people will KNOW what type of ABUSE too many of our COGIC AGENTS are engaging in, against our "TRUSTING SAINTS". I get so many calls for help, but thankfully we are at a point where people are seeing the "FACTS" of some of these abuses, on COGICJUSTICE.NET and other sites, the information will expand to.

In closing, West Side and I, are yet in a legal battle with Bishop Green, due to the "LIES", COGIC INC, CEO, GEN COUNSEL & OTHER OFFICIALS, submitted to the court there in Florida for "YEARS". Their legal bills exceed over \$300,000.00 and Sis Huff's rental home was destroyed and 3 years of rent, COGIC interfered with; by lying to the court saying they owned the 3 properties. When West Side prevailed, COGIC INC refused to pay the legal bills, 3 years rent for the private home, nor repair the destroyed rental property. So, sir, SUE ME if you desire because I welcome proving to the JURY, what a CORRUPT CULTURE our people are surviving in!

I have over 4,800 emails in my "JOURNAL", I started over 8 years ago, due to the corruption I have personally witnessed as people reached out to me for help. LIES, LIES, LIES, FRAUD, FRAUD, FRAUD & ABUSE & GRAND THEFT into the MILLIONS IN CASH & REAL ESTATE! Let's GO TO THE COURT whenever you want to, but be advised I WILL NOT BE SILENT as it relates to VICTIMS OF ABUSE of these UNGODLY DISHONEST PEOPLE!

In closing, I have retained an attorney to get the FRAUDULENT CTW lifted in Fort Worth and when it's lifted, God willing I will go back there and make sure the "RIGHT PASTOR", is in the PULPIT! Not only that, COGIC INC'S FRAUD, caused me to be arrested in Houston related to Bishop Kyles. Please know, I have the FILES to prove that the PRESIDING BISHOP, CHAIRMAN OF THE GA, BOARD OF BISHOPS EXECUTIVE COMMITTEE, GEN COUNSEL and others, ALL ENGAGED IN "FRAUD, ABUSE & GRAND THEFT", as Bishop Kyles, is owed into the MILLIONS OF DOLLARS, but for the "FRAUD", they engaged in against him. I even have charges, then Justice of the Judiciary Board, "NOW" General Counsel Saffold, filed against the then Judiciary Board Chief, for his ROLE in the Bishop Kyles SCAM!

He is on copy with you sir and can affirm that my statement is "TRUE". I will be happy to forward you his charges he filed back in 2018, then he went SILENT after he was appointed General Counsel. SO AGAIN, I will NOT BE SILENT, as to the facts of Bishop Sample's case, NOR other cases I have personal involvement in. If you decide to file the lawsuit sir, God willing I will be in Memphis for the convocation next week, and I would be HONORED to pick up the LAWSUIT from your offices. I have confidence in the Justice System, and again, IF you truly believe I am "LYING IN THESE MATTERS", FILE IT! I have WRITTEN DOCUMENTED PROOF OF THE ACCUSATIONS I HAVE ALLEGED IN THESE VARIOUS MATTERS! Its a DISGRACE to me, that the Presiding Bishop, General Board & General Counsel, to even LIE, like they are doing in the attached LETTER. Bishop Sample is NOT, emeritus, and even worse, his position as Pastor/ President of Holy Tabernacle, has NOTHING TO DO WITH HIS BISHOPRIC.

I am confident, the Sec Of State in Texas, will "AFFIRM" Bishop Sample's positions!!!!!!!!!!!!!!

Respectfully,
..

**IN THE CHANCERY COURT FOR THE THIRTIETH
DISTRICT OF SHELBY COUNTY, TENNESSEE**

**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: CH-25-1651
Part I**

MOSES TYSON, JR.

Defendant.

PLAINTIFFS' BRIEF IN SUPPORT OF PRELIMINARY INJUNCTION

Comes now Plaintiffs, by and through undersigned counsel, would file their Brief in Support of Preliminary Injunction, and in support would state as follows:

INTRODUCTION

On October 31, 2025, Plaintiffs filed a Complaint alleging in relevant part that Defendant, Moses Tyson, Jr. had engaged in a campaign of dissemination of false information that amounts to defamation through libel and slander. As a result of Defendant's defamatory actions, Plaintiffs, who are a national Christian denomination of churches, have experienced significant reputational harm and a decline in charitable giving required for the functioning and operation of the denomination. In the Complaint, Plaintiffs first request entry of a Temporary Restraining Order and Preliminary Injunction, restraining Defendant, and all persons acting in concert with him, from

publishing, broadcasting, or disseminating any further defamatory statements, including any references to "thieves," "grand theft," "elder abuse," "fraud," "groupies," or any other statement of similar defamatory import.

Also on October 31, 2025, the Temporary Restraining Order was entered, and the matter was set for hearing on November 12, 2025.

STATEMENT OF RELEVANT FACTS

It is important to first define the relevant parties named in the Complaint. The Church of God in Christ, Inc., ("COGIC") is a Christian organization in the Holiness-Pentecostal tradition and is the largest Pentecostal denomination in the United States, with its headquarters in Memphis Tennessee. The General Board of the Church of God in Christ ("General Board") is an internal body that makes final executive decisions as part of the Executive Branch of COGIC in Memphis, Tennessee. Bishop John Drew Sheard is the duly elected Presiding Bishop of COGIC, and thus, the leader of the worldwide organization. Finally, Jonathan Saffold, Jr. is the General Counsel of COGIC.

Defendant for his part has performed and recorded with countless gospel, soul, funk, R&B, and inspirational artists. Defendant is also active in the business end of the industry, putting together his own albums and setting up his own independent label, World Class Gospel. As such, he has a rather influential and widespread platform that reaches a number of individuals. Additionally, Defendant has a longstanding history with COGIC as a pastor and bishop, resulting in a following across the denomination.

Beginning on or about August 2025, and continuing relentlessly to the present, Defendant Tyson commenced a widespread, malicious, and damaging campaign of false communications. (Complaint, ¶ 12). Defendant's publications were disseminated nationally and internationally via

mass emails, YouTube videos, and social media postings, ensuring the defamatory statements reached vast numbers of individuals, including COGIC members, clergy, and the general public. (Complaint, ¶ 13).

The core of Defendant's false campaign involves reckless allegations of serious, felonious crimes. Specifically, Defendant has repeatedly accused Plaintiffs, including Bishop John Drew Sheard and other bishops, of being “thieves,” engaging in “grand theft,” and committing “elder abuse”—allegations that are demonstrably false, deeply criminal in nature, and constitute the most damaging form of defamation. (Complaint, ¶ 14).

A. Defendant’s Defamatory Emails.

Defendant has sent out a number of emails to hundreds of individuals making defamatory claims.

July 15, 2025.¹

Defendant sent an email to 32 people in which he stated in part,

“I predict COGIC INC will be brought to OPEN SHAME soon, if we stay on this course. THESE ARE CRIMES that the "DOCUMENTED FACTS" can prove ...”

“The calls I am getting right now, is really "EMBARRASSING" and if the general public reads this stuff, they are going to think that COGIC INC, is ran worse than a 3rd World Banana Republic.”

August 17, 2025.²

In this email sent to 8 individuals, Defendant asserts that COGIC tried to “steal WEST SIDE FOR YEARS” and that Defendant was dealing with “unholy callous men.” He further stated that “all involved should be FIRED and reported to the POLICE FOR ELDER ABUSE.” He

¹ Attached as Exhibit 1.

² Attached as Exhibit 2.

concluded the email by informing the readers about “WHAT LIARS WE DEAL WITH IN THE COGIC ORG.”

July 27, 2025.³

Defendant sent an email to 30 people in which he asserted,

“COGIC INC, has "AGENTS", who have engaged in MILLIONS IN THEFT from trusting people, STOLEN CHURCH ROPERTIES SOLD & THE MONIES NOT GIVEN TO THE LOCAL CHURCH OWNERS, and worse.”

...

“The COGIC CULTURE, gives power to Bishops & Agents, THEY DO NOT LEGALLY HAVE. LYING TO THE SAINTS OVER THE PULPIT, TAKING OFFERINGS AND MONIES DUE RIGHTFUL PEOPLE, IS THE NORM, but the "SECULAR LAWS THAT GOVERN OVER THE CORPORATION", allows for 3rd parties who try and "STEAL CONTROL" of the day to day operations of the church business, be "REMOVED", if need be.”

...

“Wait until you see some files I am going to send you for your records, showing where COGIC AGENTS, just "RAZORED ALL OF THE WOOL FROM THE TRUSTING SHEEP", and then moved on, while other "WEAK SHEPPERDS" said or did nothing.”

...

“So in the end, the only way COGIC INC, got the "attached Restraining Order, in addition to Bishop Kyles attorney failing to show up, is the fact that "YOU ALL INVOLVED "LIED SIR". You all LIED to the Judge in Houston, just like you all "LIED" to the Judge in Florida, when you all tried to "STEAL WEST SIDE PROPERTIES", on Feb 1st, saying they were no longer COGIC MEMBERS and that you all needed the PROPERTIES. HOW MANY MORE LIES are our OFFICIALS GOING TO TELL COURTS in order to STEAL WHAT DO NOT BELONG TO THEM"?”

Defendant concluded the email chain with the following: “I AM HERE, if you want to stay on this "FRAUDULENT ROAD", I will be there for you, God willing, when YOU ARE BROUGHT TO OPEN SHAME, for such diabolical ungodly behavior. Not only you, BUT ALL OF THOSE WHO HAVE SUPPORTED THIS SINFUL UNGODLY ABUSE and "ANY SAINT"! “Like with West Side, LIES, LIES, LIES on top of LIES, BY COGIC INC AGENTS & OFFICALS!”

³ Attached as Exhibit 3.

August 27, 2025.⁴

Defendant sent an email directly attacking Plaintiff Sheard. In the email, Defendant stated that "Bishop Sheard and other Officials, based upon my files in this case", have engaged in "FRAUD, GRAND THEFT & ABUSE", against one of our "FATHERS" and "GREAT LEADERS" in our COGIC ORGANIZATION ..."

The email went on to state,

"[W]e have victims of this type of SCAM, like West Side, where COGIC INC, its agent and our leadership, "LIED" to the court profusely for years trying to steal control of their 3 paid for properties and ministries, until finally the Judge ruled in their favor. Despite Bishop Sheard, Gen Counsel Saffold and others, KNOWING that they had "LIED" as to the facts of the case, they are refusing to pay West Side's more than \$300,000.00 legal bill, defending themselves against COGIC INC'S, "FRAUDULENT ATTEMPT", to steal their properties and ministry."

...

"Then there is the case of Bishop Kyles. Mother Lewis, mam, I have the files to prove the "FRAUD, LIES & GRAND THEFT", against him, his Jurisdiction and Local Church. Now, Bishop Jenkins is refusing to turn over the helm back to the Legal Leader, Bishop Kyles. Bishop Sheard sadly sent a "FRAUDULENT LETTER", through Bishop Bryant, to read to the saints there at ET, "AFTER", Bishop Kyles had multiple rulings, that he was INDEED the Legal Pastor/ CEO of Evangelist Temple. Then they went to court Mother Lewis, and "LIED" to the Judge, in order to get a "RESTRAINING ORDER" against Bishop Kyles, from going within 500 feet of the church he pastored for over 30 years or so. God willing, I do plan to do an "IN-DEPTH" review of Bishop Kyles case online, so the "TRUTH" will finally come out and Bishop Kyles, take back the HELM. Not to mention he is owed easily over \$2 Million Dollars, but for the "GRAND THEFT, FRAUD & ABUSE, Bishop Sheard, headed up, "AFTER" Bishop Blake left office."

...

"I have attached the letter showing Bishop Sample had already made that decision, in January, PRIOR to Bishop Sheard's, ILLEGALLY going to HTC, to undermine his "LEGAL AUTHORITY". At best, Bishop Sheard in my opinion and his cabinet should be made to take a TEST showing they even KNOW, their job descriptions.

⁴ Attached as Exhibit 4.

The only reason why I believe it's fraud, because I know, they wouldn't allow this to happen to them, in their role as CEO/PASTOR of their local perspective churches. If this CULTURE OF CORRUPTION, GRAND THEFT, FRAUD & ABUSE do not STOP, I predict COGIC INC, will be brought to OPEN SHAME, and once the FILES, are turned over to the proper authorities, some of these same men we see in ROBES, carry CROSSES & WEARING GOLD CHAINS, will be wearing ORANGE SUITS, and preaching in RYKERS prison.”

...

“Bless you Mother Lewis, and I apologize for this lengthy letter, but sadly the "CRIMES & ABUSES ARE MANY" against our own SAINTS.”

August 29, 2025.⁵

Defendant sent an email to a number of pastors and other individuals within the denomination in which he asserted,

“Mind you sir, we have YEARS OF GRAND THEFT & FRAUD well documented going on within the COGIC INC, organization.

...

The games Bishop Sheard and his "SYCHOPHANTS" are playing inside the organization, are CRIMES in the REAL WORLD, and such "FACTUAL STATEMENT", will be proven soon, should we stay on this road.

...

As you are going to see as these video series continue, they have a HISTORY of LYING TO COURTS, in order to "STEAL CONTROL" of properties and ministries, that they have NO RIGHTS TO.

...

All of this will come out over time as we continue to EDUCATE our people, so they can protect themselves from the PREDATORY SPIRIT that permeates throughout the TOP LEVELS of COGIC INC, an organization, that I predict the FEDS will be going to MASON TEMPLE ...

...

Please see where "AFTER", they ABUSED WEST SIDE, Gen Counsel Saffold, "attached minutes", later went to a meeting with Green, and LIED to the saints there, as to the FACTS of "WEST SIDE'S ABUSE". They yet have over \$300.000.00 in LEGAL FEES, due to Bishop Sheard's and his SYCHOPHANTS, who allowed HIM as CEO, to allow the courts in Florida be LIED TO!”

⁵ Attached as Exhibit 5.

Sept. 6, 2025.⁶

Defendant sent to over 50 people a copy of a letter he had sent to Plaintiff Sheard, in which he wrote,

“I only urge you NOT to send no GOONS to HT, trying to block Bishop Sample from carrying out his duties as Pres/ Pastor of HTC. If you do, they will be met with law enforcement and we will FILE every appropriate criminal charges against you all, for once again TRYING TO STEAL control of another non-profit organization, using FRAUDULENT BULLYING TACTICS! Thankfully, the many saints who have reached out to me, BELIEVE what I have said in the video uploads, and there is plenty more information to come. “

...

“I would hate for you to be IMPEACHED, as there are "LEGITIMATE CHARGES" filed against you as you know in this matter, and West Side may be forced to do so as well, given you left them with more than \$300,000.00 in legal fees, a destroyed rental home & over 3 years of back rent to Sis. Huff, in COGIC INC'S, YOU & GEN COUNSEL SAFFOLD'S "FAILED ATTEMPT", to steal control of West Side 3 paid for properties, and their ministry.”

Defendant further urged one congregation to sever ties with COGIC and stated.

“We will recommend they spell out; the association with COGIC INC, is basically attending various " NATIONAL CONVENTIONS & PAYING DUES"! In addition, they best make sure there is NO TRUST CLAUSE associated with Memphis Headquarters, be NOWHERE NEAR their paperwork. Just like with HTC by-laws, they clearly spell out, HTC is a "STAND ALONE"! NO GOVERNANCE BY COGIC INC, so just that alone, nullify any document Bishop Sheard or Bishop McClelland gave to Elder Williams. I am really baffled as to why Bishop Sheard has failed to see the wisdom to pull the plug now and save the embarrassment their illegal actions will bring.”

...

“In closing sir, I look forward to facilitating the Official public Installation of your successor. We can discuss all of this, prior to my return to Fort Worth. Thanks again Bishop Sample, for "trusting me" enough to assist you in this most "SACRED" matter. You are one of our "TREASURED FATHERS", and I apologize for the mistreatment you have experienced; HOWEVER, I am convinced that "GOD" may have allowed it, in order to expose the abusive culture that permeates within our organization, in such matters. Paid for properties, worth Millions of Dollars, money in the bank & then National Officials conspire to illegally gain control of the SPOILS, to divide among "disqualified people". God has his way of EXPOSING AND CLEANING UP, corruption, and I am sure YOUR NAME, will be called when those coming behind us, read how you took a "COURAGEOUS STAND",

⁶ Attached as Exhibit 6.

against those who tried to "BLOCK THE DIRECTIVES" GOD, gave to you, as you move into the next phase of your life & ministry.”

Oct. 29, 2025.⁷

Defendant sent an email to over 30 people in which while addressing the Westside matter stated “that entire case was the result of "FRAUD, LIES & ABUSE", by our Leadership & you Gen Counsel Saffold.”

He further stated,

“General Counsel Saffold sir, I regret rather than just be honest, OUR LEADERSHIP chose to continue down the "FRAUD ROAD" and then use "INTIMIDATION TACTICS" to try and "SHUT UP" those who are not afraid to "STAND ON TRUTH". The cops were called on me in Fort Worth when the Legal Pastor, Bishop Sample invited me into his local church office, and the "FRAUDULENT APPOINTMENT PAPER", the Presiding Bishop & Bishop McClelland gave to the Elder, LYING SAYING he is the Pastor of Holy Tabernacle, was used to secure a fraudulent CTW against me, of which I have had to retain an attorney to get it lifted, by showing that INDEED, you Gen Counsel Saffold, Bishop Sheard & Bishop McClelland, actions are indeed "ILLEGAL, FRAUDULENT & DOWN RIGHT WICKED. This should NOT be happening, but

because in my opinion, your consciousness is "WAXED FROZEN", you fell nothing of the ABUSE you are engaging in against Bishop Sample, nor Bishop Kyles. There are others, but them are the main two, I am focused on right now in this note to you!”

He further acknowledged as to the uncertainty of his accusations as stated, “Anyway, God bless you all, and "IF" anything I said in this attached interview is not correct, PLEASE let me know, so I can correct it. I am making "SURE" that my statements are backed by the "LAWS & LEGAL DOCUMENTED BEHAVIOR", of those involved in these various "UNGODLY MATTERS”

Defendant also appears to acknowledge church structure which undermines portions of his Youtube videos where he claims COGIC is liable for wrongdoing at the local church level. Specifically, the email states,

“The local church non-profit organization as you well know sir, has no LEGAL TIES, to Memphis Inc. No National Officers are on the bank accounts, deeds or bills and they have no responsibility for the SOLVENCY of the local churches!”

⁷ Attached as Exhibit 7.

B. Defendant's Defamatory Videos.

Additionally, the Defendant's pervasive activities on YouTube have amplified his malicious message, repeatedly accusing the Plaintiffs and the organization's leadership of felonious and criminal activities, resulting in ongoing, irreparable reputational and financial harm. (Complaint, ¶ 18). For instance, Defendant appeared on The Juice Radio and Talk Show on YouTube on October 26, 2025.⁸ During the interview, that was viewed by over 7,700 individuals, Defendant stated that COGIC attempted to "steal Westside property" when the congregation tried to leave COGIC with the real property where the church was meeting. He further stated that COGIC's "agent" in a Florida church stole over \$600,000.00 and that COGIC refused to repay the stolen funds.

Further, On October 30, 2025, a day before the current lawsuit was filed, Defendant made another appearance on The Juice Radio and Talk Show on YouTube.⁹ This interview has been viewed by more than 2,200 people. During the interview Defendant stated that COGIC had illegally taken local church property, had presented false documents to courts, and had illegally removed pastors. Defendant further stated that COGIC had "abusive agents" taking advantage of local churches. He stated that "someone would probably be going to jail." He stated that he had files showing "millions of dollars in theft" – eluding that it was COGIC who committed the thefts and had covered it up. Defendant repeatedly stated that COGIC had committed "abuses" against the local churches, including elder abuse of a senior pastor in Texas.

The publications are profoundly damaging to Plaintiffs' reputations, as the integrity of the Board of Bishops and the corporate structure is necessary for the spiritual stability and smooth

⁸ Available at <https://www.youtube.com/watch?v=kDfuxaiUOS4>

⁹ Available at <https://www.youtube.com/watch?v=qD7LiJx4upg>

operation of the entire organization, from the national corporation down to the jurisdiction and district levels. (Complaint, ¶ 17). Defendant's repeated invocation of the COGIC brand, insignia, and ecclesiastical authority in his defamatory broadcasts has created the false appearance of an internal Church investigation or sanctioned communication. These misrepresentations have caused confusion among COGIC members, pastors, and the public, leading to reputational harm and dilution of COGIC's goodwill as a globally recognized religious body headquartered in Memphis, Tennessee. (Complaint, ¶ 19).

LEGAL ANALYSIS

The Tennessee Rules of Civil Procedure provide:

A temporary injunction may be granted during the pendency of an action if it is clearly shown by verified complaint, affidavit or other evidence that the movant's rights are being or will be violated by an adverse party and the movant will suffer immediate and irreparable injury, loss or damage pending a final judgment in the action, or that the acts or omissions of the adverse party will tend to render such final judgment ineffectual.

Tenn. R. Civ. P. 65.04(2) (2005). The following factors generally must be considered by the trial court when deciding whether to grant a preliminary injunction:

- (1) the threat of irreparable harm to the plaintiff if the injunction is not granted;
- (2) the balance between this harm and the injury that granting the injunction would inflict on defendant;
- (3) the probability that plaintiff will succeed on the merits; and
- (4) the public interest.

Robert Banks, Jr. & June Entman, Tennessee Civil Procedure § 4-3(j), at 4-22 (1999) (emphasis added); see also *Johnson v. City of Clarksville*, No. M2001-002273-COA-R3-CV, 2003 Tenn.App. LEXIS 413, at *11, 2003 WL 21266937 (Tenn. Ct.App. June 3, 2003).

I. THERE IS A STRONG PROBABILITY THAT PLAINTIFFS WILL SUCCEED ON THE MERITS.

In order to satisfy the factor of the probability of success on the merits, a plaintiff "need only raise questions going to the merits so serious, substantial, and doubtful as to make them fair ground for litigation and thus for more deliberate investigation." *Foster-Helms v. Poole*, 2020 Tenn. Cir. LEXIS 377, *8 (No. 20C954, Davidson Cty. Cir. Ct., May 14, 2020). Thus, while a plaintiff must show more than the mere possibility of success, a plaintiff is not required to prove its case in full in order to obtain a temporary injunction. In this case, Plaintiffs have raised significant issues and have asserted sufficient facts to support the probability that they will succeed on the merits of their case.

- A. Plaintiffs have established a strong probability of success on the merits of their claim for defamation based on Defendant's extensive and continued slander and libel.

In Tennessee, the tort of defamation encompasses both libel and slander. In this case, Plaintiffs' defamation claim is for both slander and libel. To establish a prima facie case of defamation, a plaintiff must prove that: (1) a party published a statement; (2) with knowledge that the statement was false and defaming to the other; or (3) with reckless disregard for the truth of the statement or with negligence in failing to ascertain the truth of the statement. *Hibdon v. Grabowski*, 195 S.W.3d 48, 58 (Tenn.Ct.App.2005) (citing *Sullivan v. Baptist Mem'l Hosp.*, 995 S.W.2d 569, 571 (Tenn.1999) (relying on Restatement (Second) of Torts § 580 B (1977))).

1. Slander and Libel.

Slander is "the speaking of base and defamatory words which tend to prejudice another in his reputation, office, trade, business, or means of livelihood." *Little Stores v. Isenberg*, 26 Tenn.App. 357, 172 S.W.2d 13, 16 (1943). Publication to a third party is an essential element of a

claim for slander. *Little Stores*, 172 S.W.2d at 16. "Publication is a term of art meaning the communication of defamatory matter to a third person. In the case of slander, 'publication' occurs when the defamatory matter is spoken." *Quality Auto Parts Co. v. Bluff City Buick*, 876 S.W.2d 818, 821 (Tenn.1994) (internal citations omitted). In addition, "only statements that are false are actionable [in a defamation case]; truth is, almost universally, a defense." *West v. Media Gen. Convergence, Inc.*, 53 S.W.3d 640, 645 (Tenn.2001).

"A libel action involves written defamation." W. Page Keeton, *Prosser and Keeton on Torts* § 111, p. 771 (5th ed.1984); *Quality Auto Parts Co., Inc. v. Bluff City Buick Co., Inc.*, 876 S.W.2d 818, 820 (Tenn.1994). Broadcasts, however, "should be considered as libel; particularly if they are based on written scripts." *Ali v. Moore*, 984 S.W.2d 224, 227 (Tenn.Ct.App.1998). For a communication to be libelous, it must constitute a serious threat to the plaintiff's reputation. A libel does not occur simply because the subject of a publication finds the publication annoying, offensive or embarrassing. The words must reasonably be construable as holding the plaintiff up to public hatred, contempt or ridicule. They must carry with them an element "of disgrace." *Kersey*, 2006 WL 3952899, at *3 (quoting *Stones River Motors, Inc. v. Mid-South Pub. Co.*, 651 S.W.2d 713, 719 (Tenn.Ct.App.1983)) (quoting W. Prosser, *Law of Torts* § 111, p. 739 (4th ed.1971)).

Here the slanderous and libelous statements by Defendant are numerous. Defendant repeatedly accuses COGIC leaders of "Fraud," "Grand Theft," and "Criminal Activity". He states, "Your actions were illegal, immoral, fraudulent and abusive," and predicts that leaders "will be wearing orange suits and preaching in Rykers prison." He also alleges "federal fraud" and predicts "the Feds will be going to Mason Temple soon." He claims COGIC officials "lied to the courts", that the General Counsel "lied to a court" and "attached false minutes", and made falsehoods to obtain restraining orders. He alleges national COGIC leaders are "stealing properties and money"

and that leadership was "TRYING TO STEAL control of another nonprofit". He specifically refers to the actions as "attempted GRAND THEFT." He explicitly states, "You are guilty of elder abuse against Bishop Sample", claiming the bishops "bullied" Bishop Sample and "withheld pay." The false accusations were distributed to dozens of third parties and online, including national officers, prominent COGIC figures (like Bishop Sexton, Bishop Dixon, Bishop Wooden, Mother Lewis, etc.), and local clergy and members across the country. (See Exhibits 1-7). He appears video uploads and public releases on social media. Defendant makes all of the above accusations and claims without ever presenting one shred of evidence in support thereof. Defendant is quick to accuse Plaintiffs of criminal, unethical, and sinful behavior, yet he is intentionally vague and ambiguous about the underlying facts that form the basis of these accusations.

Defendant, Moses Tyson, Jr., engaged in a widespread campaign of defamatory communications across multiple platforms—emails, social media, and YouTube interviews—each of which constitutes publication under Tennessee law. His defamatory statements were distributed to dozens of recipients per email, including bishops, pastors, church officers, and lay members across the country, and to thousands more through YouTube broadcasts and social media postings. Publication to third parties is indisputable and satisfies the essential element for both slander and libel. See *Quality Auto Parts Co. v. Bluff City Buick Co.*, 876 S.W.2d 818, 821 (Tenn. 1994).

Further, Plaintiffs would assert that the above defamatory statements are categorically false. Neither Plaintiffs, nor any official of COGIC, have engaged in any illegal or unethical conduct in connection with Bishop Robert L. Sample, Holy Tabernacle Church, or any related matter. (Affidavit of Saffold – Exhibit 8). Further, as it pertains to Plaintiff Saffold, as a licensed attorney and officer of the court, his professional reputation and credibility are central to his ability to serve as General Counsel and to advise the national leadership of COGIC. Mr. Tyson's repeated

public accusations of criminality and dishonesty directly attack the integrity essential to Mr. Saffold's legal profession. (Affidavit of Saffold – Exhibit 8).

Plaintiffs are substantially likely to prevail because Defendant's statements are false assertions of criminal fact, not protected opinion, criticism, or hyperbole. Defendant repeatedly accused COGIC leadership of committing specific crimes—including "Grand Theft," "Fraud," "Elder Abuse," lying to judges, falsifying legal documents, and stealing property and funds from local churches—and asserted that Plaintiffs would "be wearing orange suits" in prison. Such allegations constitute defamation per se because they falsely charge Plaintiffs with serious crimes, unethical conduct, and moral turpitude. Defendant did not couch his statements as opinion, speculation, or religious disagreement; he represented them as "documented facts," "crimes," and "evidence" he possessed. Plaintiffs have submitted sworn affidavits confirming such accusations are wholly false. Accordingly, Plaintiffs will be able to prove falsity and satisfy the second element.

2. Reputational and Financial Harm.

Finally, to establish any type of defamation claim, whether slander or libel, the claimant must prove that the defamation resulted in injury to the person's character and reputation. *Quality Auto Parts Co.*, 876 S.W.2d at 820 (citing *Little Stores*, 172 S.W.2d at 16). "To be actionable, the alleged defamatory statement must 'constitute a serious threat to the plaintiff's reputation.'" *Davis v. Tennessean*, 83 S.W.3d 125, 128 (Tenn.Ct.App.2001) (quoting *Stones River Motors, Inc. v. Mid-South Publ'g Co.*, 651 S.W.2d 713, 719 (Tenn.Ct.App.1983)). "It is reputation which is defamed, reputation which is injured, and reputation which is protected by the law of defamation." *Spicer v. Thompson*, No. M2002-03110-COA-R3-CV, 2004 WL 1531431, at *5 (Tenn.Ct.App. July 7, 2004) (citing *Gobin v. Globe Publ'g Co.*, 232 Kan. 1, 649 P.2d 1239, 1243 (1982); 50

Am.Jur.2d Libel and Slander § 2 (1995)). Damages from false or inaccurate statements cannot be presumed; actual damages must be sustained and proved.” *Davis*, 83 S.W.3d at 128 (citing *Memphis Publ'g Co. v. Nichols*, 569 S.W.2d 412, 419 (Tenn.1978)). “When looking at damages for a defamation suit this court has stated that, ‘the issue is whether the record contains any material evidence of impairment of reputation and standing in the community, personal humiliation, or mental anguish and suffering.’ ” *Murray v. Lineberry*, 69 S.W.3d 560, 564 (Tenn.Ct.App.2001) (citing *Myers v. Pickering Firm, Inc.*, 959 S.W.2d 152, 164 (Tenn.Ct.App.1997)).

In the present matter, the defamatory statements have cause great harm to the various Plaintiffs. Mr. Tyson's statements were published to a national and international audience, including other bishops, clergy, and members of the Church, as well as the general public via YouTube and email dissemination lists reaching thousands of recipients. The defamatory accusations were also directed to and copied to individuals within the COGIC community, including pastors, attorneys, and officials who have ongoing professional dealings with COGIC. Because Defendant's accusations include allegations of felonious conduct, fraud, and dishonesty in Mr. Safford's profession, they constitute defamation per se under Tennessee law. (Affidavit of Safford – Exhibit 8). Injury to Mr. Safford's reputation is presumed, and he have in fact suffered reputational harm and emotional distress as a result. (Affidavit of Safford – Exhibit 8). Following the dissemination of Defendant's statements, Mr. Safford has been questioned by colleagues, bishops, and members of the public concerning the false accusations, resulting in reputational embarrassment and interference with his ability to carry out my duties. (Affidavit of Safford – Exhibit 8). These inquiries have required Mr. Safford to issue clarifications and responses to preserve the credibility of the Church's legal department. He has personally observed the negative impact of Defendant's publications within the COGIC community. (Affidavit of Safford – Exhibit

8). His false statements have eroded trust in Church governance, disrupted lines of authority, and caused confusion and discord among congregations. Defendant's conduct has caused irreparable harm to Plaintiffs' personal reputation, professional standing, and to the institutional integrity of the Church of God in Christ, Inc. The ongoing nature of his defamation continues to injure both Mr. Safford and the organization he serves. (Affidavit of Safford – Exhibit 8).

Further, membership and income in local churches and jurisdiction have declined as a result of the above statements made by Defendant. (Affidavit of Willie Green – Exhibit 9). Some members and visitors to Mr. Green's church have told him that they left or will not come back as a result of the statements made by Defendant. Others have stated that they have a negative view of COGIC and Bishop Sheard as a result of Defendant's statements. (Affidavit of Willie Green – Exhibit 9).

Defendant Moses Tyson, Jr., is engaged in a malicious, ongoing, and widespread campaign of defamation *per se* against Plaintiffs by repeatedly and publicly accusing the organization's leadership of serious felonious crimes, specifically "Grand Theft," "Fraud," and "Elder Abuse," as well as statements regarding low moral character. In addition to the ongoing defamation, Defendant's conduct constitutes a direct and ongoing threat to the reputation and goodwill of the Church of God in Christ, Inc. Defendant has publicly invoked the COGIC name and his ecclesiastical credentials to lend false credibility to his defamatory claims, thereby misleading the public and causing confusion regarding the Church's official positions and actions. Because reputational and goodwill injuries are presumed irreparable under Tennessee and federal law, equitable intervention is necessary to prevent continuing dilution of the Church's brand, identity, and moral authority. Defendant's defamatory publications are disseminated nationally and internationally via mass emails, YouTube videos, and social media postings. This is not a single

past event, but a relentless and continuing course of conduct that causes daily, irreparable harm to Plaintiffs' ecclesiastical mission, corporate reputation, and essential charitable fundraising ability. Because the defamatory statements are ongoing and causing injury in the form of reputational damage, undermined spiritual authority, and lost charitable contributions—the value of which cannot be fully calculated or recovered after the fact, and continuingly—money damages alone are an inadequate remedy. The harm to Plaintiffs (destruction of public trust and financial injury to a worldwide religious organization) vastly outweighs the minimal harm to the Defendant, who would only be restrained from engaging in further unlawful, defamatory speech.

B. Plaintiffs have established a strong probability of success on the merits of their claim for False Light Invasion of Privacy.

Tennessee recognizes four types of invasion of privacy: “(a) unreasonable intrusion upon the seclusion of another ... (b) appropriation of the other's name or likeness ... (c) unreasonable publicity given to the other's private life ... (d) publicity that unreasonably places the other in a false light before the public....” Restatement (Second) of Torts § 652A(2) (1977); see, e.g., *Givens v. Mullikin*, 75 S.W.3d 383, 411 (Tenn.2002). Here, Plaintiffs’ cause of action for invasion of privacy involves primarily an allegation of false light publicity. In *West v. Media Gen. Convergence, Inc.*, 53 S.W.3d 640, 645 (Tenn.2001), the Tennessee Supreme Court expressly recognized the tort of false light invasion of privacy as set forth in Section 652E of the Restatement (Second) of Torts, which defines this tort as:

One who gives publicity to a matter concerning another that places the other before the public in a false light is subject to liability to the other for invasion of his privacy, if

(a) the false light in which the other was placed would be highly offensive to a reasonable person, and

(b) the actor had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the other would be placed.

Restatement (Second) of Torts § 652E (1977).

The Court of Appeals has elaborated on the meaning of the term “publicity” as used in the context of a false light claim:

What is meant by the term “publicity” used in Section 652E? Comment a to Section 652E of the RESTATEMENT (SECOND) OF TORTS refers back to Comment a to Section 652D, which states:

“Publicity,” as it is used in this Section, differs from “publication,” as that term is used in § 577 in connection with liability for defamation. “Publication,” in that sense, is a word of art, which includes any communication by the defendant to a third person. “Publicity,” on the other hand, means that the matter is made public, by communicating it to the public at large, or to so many persons that the matter must be regarded as substantially certain to become one of public knowledge. The difference is not one of the means of communication, which may be oral, written or by any other means. It is one of a communication that reaches, or is sure to reach, the public.

Thus it is not an invasion of privacy, within the rule stated in this Section, to communicate a fact concerning the plaintiff's private life to a single person or even to a small group of persons.

Secured Fin. Solutions, LLC v. Winer, No. M2009–00885–COA–R3–CV, 2010 WL 334644, at *4 (Tenn.Ct.App. Jan. 28, 2010), perm. app. den. (Aug. 25, 2010). In *Winer*, the plaintiffs' false light claim against the defendant was based on an email to a business associate and an oral statement to another business associate, both of which allegedly implied that the plaintiffs' business was being shut down by regulators. *Id.* at *1. The Court upheld the trial court's grant of summary judgment on the plaintiffs' false light claim. *Id.* at *4. Because statements or disclosure to one person or a small group of persons is not sufficient, the Court held that the defendant's “communication fails, as a matter of law, to satisfy the ‘publicity’ requirement of the tort of false light invasion of privacy.” *Id.* See also 1 Rights of Publicity and Privacy § 5:114 (2d ed.) (updated March 2012)

(“Thus, in a false light case, plaintiff must plead and prove that the matter was ‘widely publicized [and] ‘[d]isclosure to just a few persons is not sufficient.’

In the present matter, Defendant’s dissemination was not limited or private — it was widespread, intentional, and targeted to maximize exposure and humiliation. Defendant sent repeated mass emails to dozens of bishops, pastors, national leaders, and congregants, reaching an audience nationwide within COGIC and beyond; disseminated accusations through YouTube interviews to thousands of viewers on October 26 and October 30, 2025; and repeatedly urged recipients to share the materials broadly, guaranteeing further distribution.

These communications were directed to large groups of COGIC clergy and members and then to the general public on an international platform (YouTube), satisfying the “publicity” requirement many times over. Unlike the single-email communication rejected in *Winer*, Defendant’s publications were deliberately broadcast to a vast and ever-expanding audience, making it “substantially certain” the accusations would become public knowledge.

Defendant’s statements did more than defame Plaintiffs — they portrayed them before the public as corrupt, criminal, unethical, predatory, abusive, and spiritually unfit to lead. Such characterizations strike at the heart of Plaintiffs’ identities as religious leaders and a faith-based institution.

Among other falsehoods, Defendant accused Plaintiffs of committing “fraud, grand theft, and abuse” against pastors and churches; engaging in “crimes” and “documented criminal behavior” that would result in “FEDS going to Mason Temple”; “lying to courts” to “steal properties”; “elder abuse” and using “goons” and “intimidation tactics”; and operating a “culture of corruption” worse than a “third-world Banana Republic.”

Portraying the Presiding Bishop of a worldwide denomination, its Board of Directors, and its General Counsel as criminals, liars, and abusers — particularly to their congregants, peers, and the public — is highly offensive to a reasonable person. It undermines not only their character and professional integrity, but also their spiritual authority, moral standing, and credibility as leaders of a global religious body. No reasonable person would consider being falsely portrayed as a criminal, corrupt church official, or an abuser of the elderly as anything less than deeply humiliating, offensive, and damaging.

False light, like defamation, requires knowledge of falsity or reckless disregard for the truth. *West*, 53 S.W.3d at 647. Defendant’s communications repeatedly demonstrate such reckless disregard. In the present matter, Defendant has asserted criminal allegations as “facts” while admitting uncertainty — stating, “IF anything I said ... is not correct, PLEASE let me know so I can correct it”; claimed to possess “documents” and “files” proving his claims, yet has produced none; intentionally ignored church documents, bylaws, and factual records demonstrating his statements were false; and admitted his accusations were based on his “opinion” and belief in a “culture of corruption,” not on verifiable evidence.

Defendant’s explicit admission that his statements may be untrue confirms reckless disregard for their accuracy — he published first, sought truth later. Publishing unverified, sensational claims of criminal conduct to thousands of people and an international audience satisfies the “actual malice” threshold required for false light.

The widespread publicity, the highly offensive and humiliating false portrayal of Plaintiffs as criminals and abusers, and Defendant’s reckless disregard for truth collectively establish a strong probability that Plaintiffs will succeed on the merits of their false light invasion of privacy claim.

C. Plaintiffs have established a strong probability of success on the merits of their claim for Tortious Interference.

The Tennessee Supreme Court expressly adopted the tort of intentional interference with business relationships in *Trau–Med of Am., Inc. v. Allstate Ins. Co.*, 71 S.W.3d 691 (Tenn. 2002).

The Court explained that the elements of the tort include the following:

(1) an existing business relationship with specific third parties or a prospective relationship with an identifiable class of third persons; (2) the defendant's knowledge of that relationship and not a mere awareness of the plaintiff's business dealings with others in general; (3) the defendant's intent to cause the breach or termination of the business relationship; (4) the defendant's improper motive or improper means; and finally, (5) damages resulting from the tortious interference.

Trau–Med, 71 S.W.3d at 701 (footnotes and citation omitted).

In the present matter, COGIC, as a national religious denomination, maintains ongoing business and economic relationships with its member churches, pastors, jurisdictions, bishops, and congregants—relationships essential to its governance, funding, charitable operations, and ministry support. These include donations, apportionments, jurisdictional funding, and national ministry offerings. Defendant's communications were specifically targeted at these individuals, including bishops, pastors, members, and church officers, demonstrating interference with existing and prospective economic relationships.

Defendant is a COGIC pastor with decades of involvement in COGIC's ecclesiastical structure. He specifically identified national leadership, bishops, pastors, and local congregations as his target audience. His emails show clear knowledge of the financial and organizational relationship between COGIC headquarters and its churches, referring to “dues,” “national conventions,” “legal obligations,” and “trust clauses.” Defendant's own correspondence proves he targeted those relationships intentionally, as he emailed bishops, pastors, jurisdictional officers, and congregational leaders across the U.S. to discourage affiliation and financial participation.

Defendant's statements go beyond mere commentary; they explicitly urge churches and leaders to sever ties with COGIC and cease financial support to the national organization. For example, he advised one congregation to withdraw from COGIC, eliminate any reference to COGIC governance, and refuse to comply with directives of the Presiding Bishop. The interference was not incidental — it was purposeful and explicit. This demonstrates a calculated intent to disrupt the financial and cooperative relationships that sustain COGIC's ministry and operations.

Under *Trau-Med*, "improper means" include "fraud, deceit, misrepresentation, defamation, and illegal conduct." Defendant's campaign was rooted in the mass dissemination of false, defamatory accusations of criminal activity, theft, fraud, elder abuse, and corruption. He used mass email blasts, social media, and YouTube interviews to publicly smear COGIC leadership, intentionally incite distrust, and encourage rebellion against church governance. These actions constitute improper means as a matter of law because they rely on false criminal accusations, defamation, coercion, and intimidation, not legitimate critique. Further, Defendant acted with improper motive—seeking to damage the credibility, authority, and governance of COGIC leadership, and to elevate himself as an alternative voice of authority to COGIC members and pastors.

Plaintiffs have already experienced loss of membership confidence, confusion within congregations, reputational damage, and a decline in charitable financial support essential to the denomination's operations. Defendant's conduct has caused measurable interference with financial contributions, ministry partnerships, and the ability of the General Board and General Counsel to effectively govern and conduct business on behalf of COGIC. These damages are ongoing and escalating.

Plaintiffs have clearly demonstrated a likelihood of success because Defendant's conduct meets every *Trau-Med* element and has already caused substantial harm to COGIC's financial, operational, and ecclesiastical relationships. Preliminary injunctive relief is therefore appropriate.

CONCLUSION

For all the foregoing reasons, Plaintiffs have more than satisfied the standard for injunctive relief under Tenn. R. Civ. P. 65.04. The evidence clearly demonstrates that Defendant's ongoing campaign of false, malicious, and widely-publicized defamatory statements has caused, and will continue to cause, immediate and irreparable harm to Plaintiffs' reputations, spiritual authority, ecclesiastical governance, and financial stability. The injury suffered is not speculative, but real, present, and escalating daily. No adequate remedy at law exists that could repair the widespread reputational damage, loss of goodwill, disruption of ecclesiastical order, and decline in charitable support resulting from Defendant's continued misconduct.

The balance of equities also strongly favors Plaintiffs. Granting the injunction will impose no undue burden on Defendant, as it merely restrains him from engaging in unlawful, defamatory conduct—speech which enjoys no constitutional protection. In contrast, denying injunctive relief would permit Defendant to persist in disseminating baseless accusations of criminality, fraud, and corruption to thousands of church members and the public, magnifying irreparable injury.

Plaintiffs have demonstrated a substantial likelihood of success on the merits of their claims for defamation, false light, and tortious interference, each of which is independently sufficient to support injunctive relief. Finally, the public interest strongly supports the issuance of a preliminary injunction. Religious organizations of this size and prominence provide vital spiritual, charitable, and community services. Preventing the spread of false criminal accusations, preserving the

integrity of ecclesiastical governance, and safeguarding the public from misinformation directly serve the public good.

Accordingly, Plaintiffs respectfully request that this Court grant the Preliminary Injunction in full, restraining Defendant, and all persons acting in concert with him, from further publishing, broadcasting, or disseminating any defamatory statements concerning Plaintiffs pending final resolution of this matter.

Respectfully submitted,



Taurus M. Bailey, BPR #24303
Bailey & Bailey, PLLC
44 N. 2nd Street, Suite 502
Memphis, TN 38103
901-575-8702 x. 3
taurus@baileybaileylaw.com

CERTIFICATE OF SERVICE

I, Taurus Bailey, declare as follows:

By the end of the business day on November 5, 2025, I caused to be served upon pro se Defendant Moses Tyson, Jr. by electronic mail, the following document(s): Plaintiffs' Brief In Support Of Preliminary Injunction.



Taurus Bailey, Attorney At Law

EXHIBIT 1

MS FELICIA AFFIDAVIT, SUBMITTED TO THE COURT IN THE GREEN "BOGUS" LAWSUIT AGAINST US FOR TELLING THE TRUTH RE COGIC INC'S FAILED ATTEMPT TO STEAL CONTROL OF THEIR 3 PAID FOR PROPERTIES, LYING TO THE SECULAR COURT!!!!!!

Jonathan Saffold <jsaffold@cogic.org>

Attachments

Sep 30, 2025, 6:38 PM

to jsaff13

From: Moses Tyson Jr <mosestysonjr@hotmail.com>

Date: Tue, Jul 15, 2025, 18:02

Subject: Fw: MS FELICIA AFFIDAVIT, SUBMITTED TO THE COURT IN THE GREEN "BOGUS" LAWSUIT AGAINST US FOR TELLING THE TRUTH RE COGIC INC'S FAILED ATTEMPT TO STEAL CONTROL OF THEIR 3 PAID FOR PROPERTIES, LYING TO THE SECULAR COURT!!!!!!

To: lfthuston@gmail.com <lfthuston@gmail.com>, Robert G. Rudolph Bishop Jr. <rudolph@cogic.org>, Jonathan Saffold <jsaffold@cogic.org>, bbporter@bellsouth.net <bbporter@bellsouth.net>, Donald Murray <bishopdrm@yahoo.com>

Cc: bbporter@bellsouth.net <bbporter@bellsouth.net>, pastorjwm@aol.com <pastorjwm@aol.com>, Darrell L. Hines 2 & Pamela Hines Co-fou Nder Milwaukee WI 5 <dj@creativespurts.com>, Donald Murray <bishopdrm@yahoo.com>, Larry Shaw <bishopllshaw2671@gmail.com>, bishoprljones@comcast.net <bishoprljones@comcast.net>, watty67@yahoo.com <watty67@yahoo.com>, Bishop Jerry L. Maynard <maynard202@comcast.net>, G. Ford <fordgregorym@gmail.com>, RON STIDHAM <stidhamr@prodigy.net>, Bishop Drew Sheard <jsh5948740@aol.com>, bishoproydixon.4th@gmail.com <bishoproydixon.4th@gmail.com>, Clarence Sexton <pastorcls@yahoo.com>, Michael Hill <mh.kingdom@gmail.com>, Adrian D. Bishop Williams <adwill7@bellsouth.net>, Bishop Milton Roscoe Hawkins <pastorhawkins@todcogic.org>, gwesleyhardy2@gmail.com <gwesleyhardy2@gmail.com>, Dr. Destry C. Bell <dcbministries@sbcglobal.net>, Elijah Hankerson III <ehankersoniii@cogic.org>, bishopladellthomasjr@me.com <bishopladellthomasjr@me.com>, dlinwood2002@yahoo.com <dlinwood2002@yahoo.com>, bishopjlkj@gmail.com <bishopjlkj@gmail.com>, bishop galbrathe <bishopag@comcast.net>, mjenkins25250@yahoo.com <mjenkins25250@yahoo.com>, Bishop Kyles <bishoprkyles@yahoo.com>, Earl Williams <earlwilliams629@gmail.com>, Chairman Michael Eaddy <michaeleaddy@sbcglobal.net>

Dear Chairman Bishop Thuston, General Secretary Bishop Rudolph, Chairman Bishop Donald Murray, Gen Counsel Saffold & Bishop B. Porter:

Please put the below email & attachments in your files. Why it appears that NOBODY has the courage to stand up with so many victims and tell our LEADERS the truth, I can say truthfully, that "RIGHT" is making "PROGRESS". For years I have begged our Officials, to just "DO RIGHT" by our people, and such requests have been ignored. Rather than look after the "PLIGHT" of the people, some have chosen to try and "MALIGN", Moses Tyson Jr. All will see soon, that was a "WASTE OF TIME". Trying to "KILL" the mail-man, does not stop the "CHARGES THAT REQUIRE PAYMENT". It's

so sad sirs, that many of you I have known for more than 30 to 40 years, and you have "LACKED" the courage to just "STAND UP FOR RIGHT".

I predict COGIC INC will be brought to OPEN SHAME soon, if we stay on this course. THESE ARE CRIMES that the "DOCUMENTED FACTS" can prove, is going on in, "ANY FORUM", who will review the files. Despite the "LIES" told on me by even some of "YOU SIRs", I yet stand ready to work with you to help "CLEAN UP" the aisles "littered" with "ABUSE & CORRUPTION". You can continue to sit quietly, but I predict soon, the "RATS" in the "KITCHEN", are going to run out into the DINING ROOM, where the people are eating.

For clarity sirs, I REMIND YOU: Right now, Bishop Rufus Kyles has a "ILLEGAL RESTRAINING ORDER", forbidding him from going to his local church where he is the LEGAL PASTOR, BUT FOR THE LIES COGIC INC, OFFICIALS SUBMITTED TO THE HOUSTON SECULAR COURT, that Bishop Kyles "FILES" can prove such LIES were submitted. Bishop Jenkins is ILLEGALLY at the HELM OF Evangelist Temple right now. WE WILL REVISIT THE FACTS OF THAT CASE SOON AGAIN!

Pastor Williams of Kirbyville COGIC, in Kirbyville Texas, has been "REMOVED" out of the building, due to a BOGUS TRESPASS issued as the result of FRAUDULENT INFORMATION being given to the local authorities. COGIC INC OFFICIALS, refused to just send a letter to the DA, POLICE CHIEF per their request to "AFFIRM" that indeed Pastor Williams has his credentials as the Pastor, and he paid his \$400.00 report. Bishop Destry Bell has no legal right to remove him with the COPS. That is the reason why WE MUST, educate our PEOPLE, as to the "RIGHTS" of the local church and their corporation.

We must also make sure they know how to get their BY LAWS updated to make sure that NO 3rd PARTIES can come in and "STEAL CONTROL OF THEIR PROPERTIES, BANK ACCOUNTS OR DAY TO DAY OPERATIONS! Hopefully, after we get done with Bishop Sample's case, there will be NO DOUBT as to the INDEPENDENCY of local corporations, from other Corporations, such as COGIC INC, Memphis TN. There are other cases, but these cases just came to mind! I am confident "RIGHTEOUSNESS WILL PREVAIL". It takes time, BUT "RIGHTEOUSNESS" will reach its ULTIMATE DESTINATION AND REIGN!

Bishop Murray sir, I am getting calls from Pastors, informing me that you have some "BISHOPS", illegally going in their local churches, trying to "STEAL CONTROL" of their ministries? Sir, I urge you to consider educating the BISHOPS in your chamber, so that they can stop this "ABHORRENT ILLEGAL BEHAVIOR". It's upsetting the SAINTS, who in most cases are elderly. I also urge you to consider making sure the "BISHOPS" know that at the time of appointing a "PASTOR", the church paperwork is properly in order. I. E. Non-Profit paperwork with the States, making sure the Trustee Board's & Treasurers are in place etc.... The calls I am getting right now, is really "EMBARRASSING" and if the general public reads this stuff, they are going to think that COGIC INC, is ran worse than a 3rd World Banana Republic. I am sure you have your hands full as you are just taking over the BOB, but when you get time, I would welcome speaking with you and sharing some of the information being sent to me.

God bless you all and I yet believe the Church of God In Christ is a great people, BUT clearly our Leadership needs "MUCH HELP". Rather than wasting energy in back-biting, I chose to come to "YOU ALL", after consulting with GOD OF COURSE. HE showed me where YES, HE, is the CREATOR, but he gave "MAN", the management over that which HE, CREATED! WE CAN & MUST

DO BETTER! HE, also showed me where HE, left us a BOOK OF INSTRUCTIONS, that spells out HOW WE ARE TO OPERATE, but sadly "CLEARLY" too many in charge, is either not reading it, "THE BIBLE", or is able to OBEY IT. Well, "there you are", in the words of "DAD Bishop Sheard". "OH, HOW I MISS HIM, Bishop Ford, Bishop Owens, Bishop G. E. Patterson, Bishop Dad Porter, and others, IF THEY WERE HERE, things would be "DIFFERENT".

"ANYWAY SIRRS, I LOVE YOU ALL"! Being upset with me is a waste of time. In the words of Bishop Ford, we will CONTINUE TO "DRIVE & GO FORWARD"!!!!

Please read Ms. Felicia's affidavit closely. It's sad, after all of these years, they are yet being "ABUSED", while our leadership "SAY NOTHING"!!!!

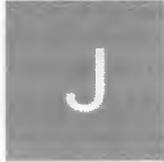
Respectfully,

Moses Tyson, Jr

CC: ALL DESIRED PARTIES!

EXHIBIT 2

Bishop Sample re...: Cogic Justice Link...COGIC INC IS TRYING TO STEAL CONTROL OF HTC CORP..SEE EMERITUS PROCESS.



Jonathan Saffold <jsaffold@cogic.org>

Tue, Sep 30,
6:37 PM

to jsaff13

----- Forwarded message -----

From: **Moses Tyson Jr** <mosestysonjr@hotmail.com>

Date: Sun, Aug 17, 2025, 08:06

Subject: Bishop Sample re...: Cogic Justice Link...COGIC INC IS TRYING TO STEAL CONTROL OF HTC CORP..SEE EMERITUS PROCESS.

To: leslie.reese82@gmail.com <leslie.reese82@gmail.com>, Mark Sample <marsam1@gmail.com>, Felicia Watts <drfeliciawatts22@gmail.com>, Mother L. Kyles <firstladik@aol.com>

Cc: Bishop Drew Sheard

<jsh5948740@aol.com>, c.h.mcclelland@sbcglobal.net <c.h.mcclelland@sbcglobal.net>, Jonathan Saffold <jsaffold@cogic.org>, Roy Dixon

<bishoproydixon4th@gmail.com>, htops@att.net <htops@att.net>, footdoctwo@hotmail.com <footdoctwo@hotmail.com>, lfthuston@gmail.com <lfthuston@gmail.com>, Clarence Sexton <pastorcls@yahoo.com>, Prince Bryant <pebryan@swbell.net>

Dear Eld Reese and Mark

Please click below link to see process of how an Official is to be emeritized. Not only that such action is NOT CONNECTED to the Bishop position as CEO/PASTOR...of his non profit Corp.

As u will see..we are NOWHERE NEAR the completion of getting Bishop Emeritized. The last Act is the General Assembly must vote on an OFFICIAL RESOLUTION granting such requests.

This foolery was about trying to STEAL HTC CORPORATE CONTROL. THEY LIED TO THE COURT trying to steal WEST SIDE FOR YEARS..even claiming ownership...but LOST.

JUDGE SAID...they has been disingenuous. I hv Ms Felicia on top line and will upload video showing the GA settled their case...SHEARD IS ON VIDEO PRAYING....YET THEY LIED PROFUSELY TRYING TO STEAL THE PROPERTY AND CONTROL OF THEIR MINISTRY. I SENT U SAFFOLD'S AFFIRMING COGIC INC do not own local properties...m

Yet I will send their submission asking the Judge to throw them ALL OUT. SHE REFUSED. SADLY the FILES will prove we are dealing with very unholy callous men. Let's upload the facts and enlighten our people.

Scroll down to click on link to see rules. They were after. HTC. This process is to be discreet and dignified. All involved should be FIRED and reporter to the POLICE FOR ELDER ABUSE.

Bishop Sheard...promised Bishop Sample he could veto their decisions...knowing this seems to be ANOTHER SCAM. MS FELICIA AND 1ST LADY KYLES can both tell you WHAT LIARS WE DEAL WITH IN THE COGIC ORG. .

MT

EXHIBIT 3

BRO. MARK SAMPLE: PLZ SEE PARTIAL INFORMATION AS IT PERTAINS TO COGIC INC, USING LIES & FRAUD TO "CONTINUE TO ILLEGALLY ABUSE BISHOP KYLES AS CEO/ PASTOR OF EVANGELIST TEMPLE! HE'S OWED WELL OVER 2 MILLION DOLLARS.... SEE ATTACHMENTS & DATES IN THEM!!!!

Jonathan Saffold <jsaffold@cogic.org>

Attachments

Sep 30, 2025, 6:38 PM

to jsaff13

From: Moses Tyson Jr <mosestysonjr@hotmail.com>

Date: Sun, Jul 27, 2025, 14:22

Subject: BRO. MARK SAMPLE: PLZ SEE PARTIAL INFORMATION AS IT PERTAINS TO COGIC INC, USING LIES & FRAUD TO "CONTINUE TO ILLEGALLY ABUSE BISHOP KYLES AS CEO/ PASTOR OF EVANGELIST TEMPLE! HE'S OWED WELL OVER 2 MILLION DOLLARS.... SEE ATTACHMENTS & DATES IN THEM!!!!

To: MS <marsam1@gmail.com>, Bishop Kyles <bishoprkyles@yahoo.com>, Mother L. Kyles <firstladik@aol.com>, GRAYLING ALEXANDER <galexan916@aol.com>

Cc: Bishop Drew Sheard <jsh5948740@aol.com>, mjenkins25250@yahoo.com <mjenkins25250@yahoo.com>, bishopproydixon.4th@gmail.com

<bishopproydixon.4th@gmail.com>, bishop galbrathe <bishopag@comcast.net>, c.h.mcclelland@sbcglobal.net <c.h.mcclelland@sbcglobal.net>, bbporter@bellsouth.net

<bbporter@bellsouth.net>, pastorjwm@aol.com <pastorjwm@aol.com>,

Bishoplmwooten@sbcglobal.net <bishoplmwooten@sbcglobal.net>, Michael Hill

<mh.kingdom@gmail.com>, Elijah Hankerson III <ehankersoniii@cogic.org>,

bishopjlkj@gmail.com <bishopjlkj@gmail.com>, lfthuston@gmail.com <lfthuston@gmail.com>,

Darrell L. Hines 2 & Pamela Hines Co-fou Nder Milwaukee WI 5 <dj@creativespurts.com>,

Clarence Sexton <pastorcls@yahoo.com>, Felicia Watts <drfeliciawatts22@gmail.com>, RON

STIDHAM <stidhamr@prodigy.net>, pastorgwjsr@gmail.com <pastorgwjsr@gmail.com>,

Chairman Michael Eaddy <michaeleaddy@sbcglobal.net>, Prince Bryant <pebryan@swbell.net>,

GRAYLING ALEXANDER <galexan916@aol.com>, watty67@yahoo.com <watty67@yahoo.com>,

Bishoprljones@comcast.net <bishoprljones@comcast.net>, Bishop Donald Murray

<bishopdrm@yahoo.com>, Jonathan Saffold <jsaffold@cogic.org>, Jr. Robert Rudolph

<rudolph@cogic.org>, Bishop Jerry L. Maynard <maynard202@comcast.net>

Dear Bro. Mark

I pray you are well sir. I am so looking forward to getting to Fort Worth next week, to assist your father in appointing and naming his successor. I thought I would send you additional information as to why I put "EMPHASIS" on the CORPORATE side of our local church ministries. As you can see in the below email thread & attachments, regarding Bishop Kyles case, of which I was asked to bring him to the BOARD OF BISHOPS TABLE in 2017, under assurances of his reinstatement back to his Jurisdiction & Local Church: after he did as I instructed him to do, PER MY ARRANGEMENT WITH THE NATIONAL LEADERSHIP, "THEY DEFRAUDED HIM", and is yet ABUSING AND DEFRAUDING HIM.

As a result of that case, I began to start making sure that moving forward in such matters with the National Church Organization, **it be made clear that COGIC INC, relationship with a local**

church NON PROFIT ORGANIZATION, is only a "FELLOWSHIP RELATIONSHIP". The power of the secular non profit organization authority for the CEO, relationship is between HE & THE SEC OF STATE, as it pertains to the VEST AUTHORITY in that CEO POSITION. A Pastor "COGIC CERTIFICATE", is very limited in that area, because the church can LEAVE COGIC INC, anytime they desire. COGIC INC, has NO PAPERWORK linking that NON-PROFIT ORG to MEMPHIS within it's corporate set up. In fact, it would be DANGEROUS for a local church to do so. COGIC INC, has "AGENTS", who have engaged in MILLIONS IN THEFT from trusting people, STOLEN CHURCH PROPERTIES SOLD & THE MONIES NOT GIVEN TO THE LOCAL CHURCH OWNERS, and worse.

After you read this thread and more information I will forward, showing where even the then Judiciary Board Member, "SAFFOLD", filed charges against then Judiciary Board Chief Justice, Bishop Martin Johnson, for his role in the "SCAM" against Bishop Kyles. The then General Board, colluded with the BOARD OF BISHOPS EXECUTIVE COMMITTEE, GEN COUNSEL & OTHERS, to "DEFRAUD BISHOP KYLES" in order to keep him out of his pulpit, and continue his legal duties as CEO/ PASTOR. Mind you again sir, we are talking 2018. Bishop Kyles PREVAILED in his case within COGIC INC, but our Leadership, including Chairman Bishop Thuston and others, "CONTINUE TO ABUSE HIM, LIE & CHEAT" in order to "STEAL HIS SPOILS" and give it to others who KNEW they were lying and abusing him. That abuse is "again", YET GOING ON! I have him and 1st Lady on top line, and they can affirm, my factual statements.

Please make sure you see, the ORDER from the BOB, and then see where Bishop Sheard, sent a "FRAUDULENT LETTER" to ET, claiming the National Pastors & Elder's Council, had the matter. Please read his 2018 REPORT, where he "AFFIRMED" Bishop Kyles was Pastor, and he gave back the assignment, citing the 2016 Judiciary Board's ruling. YET YEARS LATER, he sent his letter, from which you will see it's like a A- I letter. It contains information from Bishop Blake's 2019 letter, but the bottom of Bishop Blake's letter is "CLIPPED OFF", in Bishop Sheard's, to make it seem like, he inherited that case after he became, PB.

After you read this information, I hope you will further appreciate why I DEAL WITH THESE MATTERS NOW, FROM A NON-PROFIT CORPORATE PERSPECTIVE. The COGIC CULTURE, gives power to Bishops & Agents, THEY DO NOT LEGALLY HAVE. **LYING TO THE SAINTS OVER THE PULPIT, TAKING OFFERINGS AND MONIES DUE RIGHTFUL PEOPLE, IS THE NORM, but the "SECULAR LAWS THAT GOVERN OVER THE CORPORATION", allows for 3rd parties who try and "STEAL CONTROL" of the day to day operations of the church business, be "REMOVED", if need be.**

God willing, after we announce and appoint the new CEO/ PASTOR of Holy Tabernacle, I think we should consider having a "SEMINAR", in the very near future so that your PEOPLE, will understand why Bishop Sheard nor Bishop McClelland "EVER HAD THE AUTHORITY", to "ABUSE & TAKE CONTROL" of Holy Tabernacle's day to day business. Their actions "SADLY" have been UNGODLY, UNINTEGRAL & DECEPTIVE". I gave them the opportunity to correction with the people, but as you can see, "THEY REFUSED", therefore I will do it and allow examples of DOCUMENTED ILLEGAL BEHAVIOR by COGIC AGENTS, show why we had to "STEP IN".

WE MUST EDUCATE OUR PEOPLE. Given your occupation, I would like to see if we can develop a "DISC" with pertinent information, to upload online, showing our people, "their authorities" as it pertains to their local church ministries. They must be educated to understand that their non-profit organizations are "STAND ALONES". Wait until you see some files I am going to send you for your records, showing where COGIC AGENTS, just "RAZORED ALL OF THE WOOL FROM THE TRUSTING

SHEEP", and then moved on, while other "WEAK SHEPPERDS" said or did nothing. NOT BISHOP SAMPE!!!! HE WILL NOT BE DISRESPECTED ANY LONGER! Again, READ THE ATTACHMENTS RE "BISHOP KYLE'S SCAM".

My email diary writings unfortunately are long because the "CRIMES INVOLVED ARE MANY"!!!!!!! LACK OF KNOWLEDGE "FUELS ABUSE"!

Make sure you read Moses Tyson Doc 4 a closely as well. Ms. Joubert was the then church administrator for ET, now the National Church used LIES, to throw them out as well, given their "trying to govern ET in the first place was "FRAUDULENT", as well as the "LIES USED IN THE COURT" to throw them out! Jenkins is NOT THE LEGAL PASTOR, NOR CEO! Bishop Kyles "IS". Make sure you see the phony "FINAL ORDER" by Chairman Eaddy, his COMMITTEE HAS ABSOLUTELY NO LEGAL AUTHORITY in Evangelist Temple's nonprofit organization, not to mention, he wrote the fraudulent letter, YEARS after Bishop Kyles, was successful in his "RULINGS", as a result of his "filings". NO FEAR OF GOD AT ALL, in my opinion by the COGIC CULTURE!

See the affidavit for a TRO, which Bishop Bryant signed, "AFTER" the BOARD OF BISHOP AFFIRMED BISHOP KYLES WAS TO GET HIS REINSTATEMENT LETTER! LOOK AT THE DATES, AND THEN READ THE LIES TO A "SECULAR COURT"!!!!!! Bishop Bryant, can affirm my love and respect for him, and that is why I have always been HONEST WITH HIM. Even he owes apologies for his role, in the Bishop Kyles, ET..... SCAM!

Moses Tyson, Jr
CC: ALL DESIRED PARTIES!

From: Moses Tyson Jr <mosestysonjr@hotmail.com>
Sent: Tuesday, September 3, 2024 12:46 PM
To: Bishop Drew Sheard <jsh5948740@aol.com>; Chairman Michael Eaddy <michaeleaddy@sbcglobal.net>; bishop galbrathe <bishopag@comcast.net>; Prince Bryant <pebryan@swbell.net>; Jon Saffold <justicejsaffold@gmail.com>; Mother L. Kyles <Firstladik@aol.com>
Cc: Felicia Kidd <drfeliciakidd81@gmail.com>; bishopproydixon.4th@gmail.com <bishopproydixon.4th@gmail.com>; pastorjwm@aol.com <pastorjwm@aol.com>
Subject: PRESIDING BISHOP SHEARD: I URGE YOU TO "RESCIND THE FRAUDULENT RESTRAINING ORDER AGAINST BISHOP KYLES NOW", SEE PROOF OF THE FRAUD YOU AND OTHER NAITONAL OFFICIALS ENGAGED IN AS GEN SAFFOLD ALLOWED ONCE AGAIN THE COURT TO BE LIED TO! ENOUGH SIR, ENOUGH!

Dear Presiding Bishop Sheard:

I pray you are well. As a result of the "attached letter 1st Lady Kyles" sent to me a few days ago, where I am no in receipt of the attached "PERMENANT RESTRAINING ORDER" against IBishop Kyles and those who "KNOW" he is the "LEGAL PASTOR", given my role in this matter and the "PROOF" I have to prove that you and other Officials, have engaged in just "BLATANT LYING" and "ABUSE", I had to respond. As you know sir, "YOUR FATHER" and other National Officials, had me bring Bishop Kyles to the table with assurances. AFTE:R many conversations with Bishop Kyles, "HE AGREED" to "REPENT" in writing. Then our Natio nal Officials, in the end, took his repentance, that you asked him to do, "UNDER RULE 7c", and used the information to have another "HEARING AGAINST HIM", to destroy him. Even our LYING GEN COUNSEL SAFFOLD, filed charges, affirming

the illegal abuse, and Chief Justice Connor, can affirm he "affirmed" in his exhibits in Saffold's charges, Bishop Kyles was "ABUSED". He is on top line as well and I will resend you the "CHARGES" that our Dishonest Chairman of the GA, Bishop Thuston, HID FOR YEARS, while you all set up the illegal Destry Bell & Bishop Bates Jurisdictions.

Now sir, Chairman Eaddy issued a "FRAUDULENT RULING" and you are well aware that his committee do have the POWER to REMOVE a local Pastor. Especially, YEARS after the Judiciary Board, "RULED" no actions against the Pastor could stand. Sir, YOU PUT THAT IN YOUR ATTACHED 2018 REPORT, when you fled the assignment. Bishop Blake's attached Nov 2019 letter made it clear that "YOU AND ALL OTHER NATIONAL OFFICIALS" were out of that matter, as Bishop Kyles was deemed to no longer be a "BISHOP". So, for you to get back involved and send over that "FRAUDULENT LETTER" to Bishop Kyles, "AFTER", the Board of Bishops, "RULED AGAIN", (see attached) that Bishop Kyles was due his reinstatement letter, as of Jan 2020: For you to send Bishop Bryant to ET, AFTER that with the "LIES" in the letter, saying that Eaddy's committee was now in charge of his PASTORATE STATUS", SIR SADLY WAS JUST A BLATANT LIE! While I regret having to say this, I REGRET EVEN MORE THAT THE LIE CAME FROM YOUR OFFICE SIR!

Then Eaddy holds some type of meeting, where none of us were there, and see the attached "RULING", where he says he reviewed the Board of Bishops information etc, WAS JUST ANOTHER LIE told by another National Official. Please see Bishop Galbraith's attached ORDER. So in the end, the only way COGIC INC, got the "attached Restraining Order, in addition to Bishop Kyles attorney failing to show up, is the fact that "YOU ALL INVOLVED "LIED SIR". You all LIED to the Judge in Houston, just like you all "LIED" to the Judge in Florida, when you all tried to "STEAL WEST SIDE PROPERTIES", on Feb 1st, saying they were no longer COGIC MEMBERS and that you all needed the PROPERTIES. HOW MANY MORE LIES are our OFFICIALS GOING TO TELL COURTS in order to STEAL WHAT DO NOT BELONG TO THEM"? HOW MANY MORE?

I understand there is an APPEAL this month on the Restraining Order. However, I am sending you this letter to give you all the chance to do the RIGHT THING and rescind it NOW, so that we do NOT have to PROVE TO THE WORLD & ANOTHER COURT, the "FRAUD" our National Officials have engaged in, not to mention the LIES to the court. For you all to lock out an 82-year-old repentant man, and then "ASK FOR \$10,000.00 from "HIM" to pay for the "LIES" you all submitted against him, to lock him out of his lifelong ministry, is "DEMENTED AT BEST". I can't believe that Bishop Bryant, got himself tied up in this foolishness. I BEGGED HIM in writing, not to be come your STOOLE PIGEON in this scam, yet he signed his name for the TRO affidavit anyway. Anyway, so much for now, as I have MANY FILES, to prove the "FRAUD, LIES & GRAND THEFT OF BISHOP KYLES MONIES OWED". Before, we move further on this, I only wanted to give you all ONE LAST CHANCE TO DO THE RIGHT THING, because YOU ALL HAVE LOST ALREADY. It's just a matter of the "TRUTH", being put next to the "LIES". God willing we will get before a Judge, with 1st Lady Kyles soon. See her letter, how you can sit by and "abuse" any family like this in your position as CEO/ PRESIDING BISHOP, is most disappointing.

Let me be clear, YOU are not the only one who engaged in this FRAUDULENT BEHAVIOR, but YOU are in charge of the day to day operations while the GA is in recess. Sadly, the GA is going to have to find out about this via social media because Chairman Bishop Thuston is just as complicit in the abuse of the Kyles family and all who KNOW, Bishop Kyles is the "LEGAL PASTOR". I respect the Office of Presiding Bishop, BUT I will NEVER RESPECT "ACTIONS OF FRAUD & ABUSE", against

REPENTANT PEOPLE, in order to "STEAL WHAT BELONGS TO THEM". Bishop Sheard sir, I am NOT GOING TO HELL FOR NO REASON OR NOBODY, knowingly.

You are on dangerous grounds. Whenever a PERSON "REPENTS", and then you all use that "REPENTANCE TO DESTROY HIM USING LIES & FRAUD", you are playing with your "SOULS" in my opinion. You may play with yours, and YOUR SYCHOPHANTS might suck up to you and play with theirs, BUT YOU WILL NOT PLAY WITH MINE! I urge you to REPENT, and make things right with the KYLES & EVANGELIST TEMPLE, of which their local ministry is YET in turmoil. See Moses Tyson, Doc 4 a attached. If I didn't love you sir, I wouldn't be honest with you. If you would like to work together to resolve this matter, as brothers, I AM HERE, if you want to stay on this "FRAUDULENT ROAD", I will be there for you, God willing, when YOU ARE BROUGHT TO OPEN SHAME, for such diabolical ungodly behavior. Not only you, BUT ALL OF THOSE WHO HAVE SUPPORTED THIS SINFUL UNGODLY ABUSE and "ANY SAINT"!

Brother Mark, I also put Supt. Grayland Alexander on top line. He can affirm the LIES, CHEATING AND ABUSE, Bishop Kyles has endured since 2016 or so. He is the ONLY MAN, in that entire Jurisdiction, in my opinion who have the "ABILITY TO HAVE CHILDREN", because he has "SPIRITUAL TOTESTERONE". Look at the men, who sat there and let Bishop McClelland stand in HTC, and DISRESPECT BISHOP SAMPLE'S LEGAL POSITION as CEO/ PASTOR of the church. ONLINE!!!!!! He will affirm the LIES & ABUSE involved regarding Bishop Kyles and the entire matter. The illegal Jurisdictions created, as well as Bishop Kyles "BUT FOR THE FRAUD", IS YET THE LEGAL BISHOP of TXSE # 1, which was destroyed due to "FRAUD".

Bishop Jenkins, came to me in Memphis 2 years ago, after he took over the 10 churches or so left, and assured me he would make things right with Bishop Kyles. TO DATE, that turned out to be nothing but LIES. I went to court and watched him "LIE", to the Judge. Like with West Side, LIES, LIES, LIES on top of LIES, BY COGIC INC AGENTS & OFFICIALS! However, RIGHT WILL PREVAIL!

Respectfully,
Moses Tyson, Jr
CC: ALL DESIRED PARTIES!

EXHIBIT 4

From: Moses Tyson Jr <mosestysonjr@hotmail.com>
Sent: Wednesday, August 27, 2025 12:15 PM
To: supvbml@aol.com <supvbml@aol.com>
Cc: c.h.mcclelland@sbcglobal.net <c.h.mcclelland@sbcglobal.net>; Bishop Drew Sheard <jsh5948740@aol.com>

Subject: MOTHER LEWIS: PLZ SEE THE "FRAUD, GRAND THEFT & ABUSE" AGAINST BISHOP SAMPLE & HTC, BY OUR OWN CEO/PRESIDING BISHOP SHEARD & OTHERS! I BESEECH YOU MAM, TO ASK THE WOMEN DEPARTMENT TO PRAY, AS WE ARE ON A VERY DARK ROAD AND NEED GODLY LEADERSHIP.....

<https://youtu.be/0BJnB79SDvA> (CLICK ON LINK) to see video!

Dear Mother Lewis:

I pray you are well. Mother Lewis mam, please click on the "LINK" to see the video showing where sadly our Presiding Bishop, Bishop Sheard and other Officials, *based upon my files in this case", have engaged in "FRAUD, GRAND THEFT & ABUSE", against one of our "FATHERS" and "GREAT LEADERS" in our COGIC ORGANIZATION, Bishop Robert Sample. Bishop Sample is the Founder of Holy Tabernacle, there in Fort Worth Texas and have led that congregation for over 55 years. Rather than allow him to "step aside" as he is yet trying to do, **Bishop Sheard sadly teamed up with other within Bishop Sample's organization which he leads and tried to basically "THROW HIM OUT". They are not only denying him keys and access to his facilities, but they are also refusing to pay him his due pay, since I believe February up until now.**

I am sure your son can tell you that NO 3rd Party can walk into your local church organization and "sit him down", as the leader especially if he is the Pres/ CEO of that local non-profit organization. His status is registered with the Sec Of State, which has NOTHING to do with COGIC INC, Headquarters Memphis TN! **Mother Lewis, we have victims of this type of SCAM, like West Side, where COGIC INC, its agent and our leadership, "LIED" to the court profusely for years trying to steal control of their 3 paid for properties and ministries, until finally the Judge ruled in their favor. Despite Bishop Sheard, Gen Counsel Saffold and others, KNOWING that they had "LIED" as to the facts of the case, they are refusing to pay West Side's more than \$300.000.00 legal bill, defending themselves against COGIC INC'S, "FRAUDULENT ATTEMPT", to steal their properties and ministry. I do plan to have a PUBLIC RALLY soon.**

Then there is the case of Bishop Kyles. Mother Lewis, mam, I have the files to prove the "FRAUD, LIES & GRAND THEFT", against him, his Jurisdiction and Local Church. Now, Bishop Jenkins is refusing to turn over the helm back to the Legal Leader, Bishop Kyles. Bishop Sheard sadly sent a "FRAUDULENT LETTER", through Bishop Bryant, to read to the saints there at ET, "AFTER", Bishop Kyles had multiple rulings, that he was INDEED the Legal Pastor/ CEO of Evangelist Temple. **Then they went to court Mother Lewis, and "LIED" to the Judge, in order to get a "RESTRAINING ORDER" against Bishop Kyles, from going within 500 feet of the church he pastored for over 30 years or so. God willing, I do plan to do an "IN-DEPTH" review of Bishop Kyles case online, so the "TRUTH" will finally come out and Bishop Kyles, take back the HELM. Not to mention he is owed easily over \$2 Million Dollars, but for the "GRAND THEFT, FRAUD & ABUSE, Bishop**

Sheard, headed up, "AFTER" Bishop Blake left office. Bishop Blake is on copy as well and can affirm, I am telling the "TRUTH"!

I also put Bishop Dixon on copy, as he headed up the investigation that led to Bishop Thompson confessing that he was told by leadership, NOT to give Bishop Kyles, his reinstatement letter. So, given all of the "FRAUD" I know that is going on, I have decided to do what I can to "EDUCATE" our people as to their RIGHTS. COGIC INC, is nothing but a fellowship. That FACT, will be "ESTABLISHED", as a result of this Bishop Sample "FRAUD CASE", God willing, effectively once and for all.

Mother Lewis mam, as it relates to Bishop Sample. Mother Lewis, he nor his family has had NO TIME, to even CELEBRATE his lovely wife of over 62 years or so, death last September. Due to the GREED and coldness of many people he served and trusted, desires to take charge of what they have no "SKILLS" to "RUN". Bishop Sample is a "GODLY MAN". I spent 12 days or so with him and is headed back soon in order to "INSTALL", his successor, Pastor Seth Cunningkin.

I have attached the letter showing Bishop Sample had already made that decision, in January, PRIOR to Bishop Sheard's, ILLEGALLY going to HTC, to undermine his "LEGAL AUTHORITY". At best, Bishop Sheard in my opinion and his cabinet should be made to take a TEST showing they even KNOW, their job descriptions. **The only reason why I believe it's fraud, because I know, they wouldn't allow this to happen to them, in their role as CEO/PASTOR of their local perspective churches.** If this CULTURE OF CORRUPTION, GRAND THEFT, FRAUD & ABUSE do not STOP, I predict COGIC INC, will be brought to OPEN SHAME, and once the FILES, are turned over to the proper authorities, some of these same men we see in ROBES, carry CROSSES & WEARING GOLD CHAINS, will be wearing ORANGE SUITS, and preaching in RYKERS prison.

Bless you Mother Lewis, and I apologize for this lengthy letter, but sadly the "CRIMES & ABUSES ARE MANY" against our own SAINTS. Please keep Bishop Sample and his family in your prayers. Also the saints there at HTC, as they are disappointed as they learn that their OWN LEADERSHIP, "LIED TO THEM", regarding the "FACTS", as it relates to Bishop Sample's "yet pending" Emiratization as Bishop, which has NOTHING TO DO with his positions as CEO-PRES/ PASTOR of Holy Tabernacle. I love our Presiding Bishop and he knows that, BUT I cannot sit by and watch our SAINTS be so MASACRED! No mam, I just cannot!

On a very personal note, Mother Lewis, **I am asking Bishop Sheard in the interest of avoiding a public spectacle to "SIT DOWN", the gentleman they gave them PHONY PAPERS to, claiming he is the Pastor.** I am sure any attorney will affirm that that certificate gives no legal authority for him to do anything in that corporation at all. We will have law enforcement to remove him when I go back to Fort Worth, to reestablish Bishop Sample's positions at HTC. Elder Reese, Brother Mark, Sis. Barbara Sample and I, wanted to give the saints time to review the "FACTS", in this matter, first so they would KNOW what has truly happened. Again, God bless you Mother Lewis, and I stand ready to do my part to "CLEAN UP", the CORRUPTION, that is going on in the COGIC Kitchen.

Respectfully,
Moses Tyson, Jr

EXHIBIT 5

From: Moses Tyson Jr <mosestysonjr@hotmail.com>

Sent: Friday, August 29, 2025 11:29 AM

To: faithtalker@sbcglobal.net <faithtalker@sbcglobal.net>; pastorgwjsr@gmail.com <pastorgwjsr@gmail.com>; c.h.mcclelland@sbcglobal.net <c.h.mcclelland@sbcglobal.net>; Bishop Drew Sheard <jsh5948740@aol.com>; Jr. Robert Rudolph <rudolph@cogic.org>; Jonathan Saffold <jsaffold@cogic.org>

Cc: Bishop Drew Sheard

<jsh5948740@aol.com>; pastorjwm@aol.com <pastorjwm@aol.com>; plwsr@nc.rr.com <plwsr@nc.rr.com>; Michael Hill <mh.kingdom@gmail.com>; Larry Shaw <bishoplshaw2671@gmail.com>; Jonathan Saffold <jsaffold@cogic.org>; Mother L. Kyles <firstladik@aol.com>

Subject: ELDER PERRY WILLIAMS & BISHOP DESIGNATE SUPT. JONES: I BESEECH YOU ALL TO "RESPECT BISHOP SAMPLE'S AUTHORITY AS CEO/ PASTOR OF HTC; SUPT JONES I URGE YOU TO TELL ELDER WILLIAMS TO STAND DOWN NOW, PRIOR TO MY RETURN TO FORT WORTH, TO PUT BISHOP SAMPLE....

Dear Elder Perry Williams:

I pray you are well sir. I am sending you the below email thread, video link & attachments regarding the "SCAM", that is going on at HTC right now, under the orchestration sadly of our own Presiding Bishop, Bishop John Drew Sheard & Gen Board Member Bishop McClelland. As you can see we have the paperwork, to PROVE that Bishop Sample is yet CEO/ PASTOR of HTC! There is more information coming out soon so that there be NO DOUBT, by the membership that INDEED, Bishop Sheard, Bishop McClelland and other Officials, have engaged in easy to prove, LIES, SCAM & FRAUD!

Mind you sir, we have YEARS OF GRAND THEFT & FRAUD well documented going on within the COGIC INC, organization. What you guys are doing there at HTC is "SMALL POTATOS", except for the "ABUSE" of a GODLY MAN, Bishop Sample. Bishop Sheard went way too far, abusing this Godly man, and thankfully as the people are reviewing the "FILES", online, they agree. How could any MAN OF GOD, "LIE" to a "FATHER", ON TAPE? Then tell some young men to tell the "FATHER" he can't go into the office that he PHYSICALLY BUILT? ON top of that, "LIE" and tell YOU, that you are the Pastor of the work that even the Secretary of State, is going to verify "YOU ARE NOT"? I hope you have NOT received any unauthorized monies, because if Bishop Sample did NOT APPROVE of any expenditures you all may have spent, you will have to return such funds. I truly suggest you speak with a real corporate attorney.

The games Bishop Sheard and his "SYCHOPHANTS" are playing inside the organization, are CRIMES in the REAL WORLD, and such "FACTUAL STATEMENT", will be proven soon, should we stay on this road. Now Supt. Jones sir, I added you to this letter because, IF Bishop Sample, DECIDES to really give up his position, (THUS FAR), the GEN SEC Bishop Rudolph, HAS YET TO SEND ME A COPY OF A REQUEST FOR EMERITUS STATUS by Bishop Sample NOR his family: you are in position to take over. What I do NOT understand is how can all of you "GENTLEMEN" who this "FATHER" has led for so many years, sit by and allow this "ABUSE" of him, abuse of the saints being LIED TO, letting the Presiding Bishop "BULLY HIM", refuse to pay his monies owed, and then allow Bishop McClelland to just basically "STEAL HIS OFFICIAL NIGHT OFFERINGS"? It is disappointing to me at least, that NO MAN among your ranks has shown the courage to at least,

"DEMAND HE IS GIVEN AN APOLOGY FROM BISHOP SHEARD & HIS SYCOPHANTS, for trying to
"STEAL CONTROL OF HTC & HIS POSITIONS?"

As you are going to see as these video series continue, they have a HISTORY of LYING TO COURTS, in order to "STEAL CONTROL" of properties and ministries, that they have NO RIGHTS TO. I. E. West Side & Bishop Kyles, for just 2 examples. There are more. Not to mention the Millions of Dollars stolen by AGENTS, covered up by OFFICIALS. All of this will come out over time as we continue to EDUCATE our people, so they can protect themselves from the PREDATORY SPIRIT that permeates throughout the TOP LEVELS of COGIC INC, an organization, that I predict the FEDS will be going to MASON TEMPLE, soon, to SEE the 120 employees COGIC INC, allegedly said they had at Mason Temple working, in order to get over \$1.6 Million Dollars? I have asked about it over a year ago, to date NO RESPONSE!

Supt. Jones and Elder Perry Williams sirs, I have no ax to grind with either of you at all. However, I am disappointed that Bishop Sample has been so abused, and those he trusted, some have participated and others "SAY NOTHING". Yes, I love our Presiding Bishop and supported him, IN WRITING, for years, BUT..... that same love compels me to tell him now, that ABUSING OUR FATHERS is not only a SIN, but to try and "STEAL THEIR POSITIONS & CONTROL OF THEIR PROPERTIES" that they are in charge of, USING FRAUDULENT TACTICS, IS CRIMINAL. Sirs, the files regarding Bishop Kyles & West Side, alone will PROVE, that COGIC INC, Officials LIED TO THE COURTS, in order to try and "STEAL THEIR SPOILS". I am being sued right now, by an AGENT, who Bishop Sheard himself, PRAYED the RESTORATION PRAYER in the GA 2022 SESSION, and then went a few months later, and Told GREEN TO GO AFTER West Side!

Please see where "AFTER", they ABUSED WEST SIDE, Gen Counsel Saffold, "attached minutes", later went to a meeting with Green, and LIED to the saints there, as to the FACTS of "WEST SIDE'S ABUSE". They yet have over \$300,000.00 in LEGAL FEES, due to Bishop Sheard's and his SYCOPHANTS, who allowed HIM as CEO, to allow the courts in Florida be LIED TO! See attached Judge Order!!!!

I will upload my deposition soon in that case as well so our people can KNOW, the crimes that too many of our saints are VICTIMS OF! I am done begging these brothers to STOP THIS ABUSE! So, I hope you understand "WHY", I am passionate about Bishop Sample, being back in his pulpit, in his office and active in his LEGAL POSITIONS. He has authorized me to facilitate his desires and God willing, over the next 2 weeks, I will go to HTC to set it up for his return, so he can appoint his "SUCCESSOR" publicly.

Now, I welcome either of you to speak with me so that Elder Williams, your exit can be peaceful and truthful. I have the Presiding Bishop and others on copy, and I admonish him to "TELL THE TRUTH", and affirm that Elder Williams, your certificate have NO LEGAL AUTHORITY in that HTC CORPORATION. I have no desire to use law enforcement to remove anyone from the church, HOWEVER, Elder Williams, YOU WILL NOT BE ALLOWED to disrespect Bishop Sample, nor will the BOARD, be able to deny his authority any longer. I pray that you gentlemen do the GODLY THING, and stand with me, DEMANDING Bishop Sheard and all involved in this "SCAM", publicly apologize to Bishop Sample, his family and the saints, for this "TREACHEROUS CHAIN OF EVENTS". I will be in touch Elder Williams, with the date of my return God willing soon.

Respectfully,

Moses Tyson, Jr
CC: ALL DESIRED PARTIES!

EXHIBIT 6

PRESIDING BISHOP SHEARD & BISHOP MCCLELLAND: SEPT 28TH, GOD WILLING BISHOP SAMPLE WILL RETURN TO HOLY TABERNACLE PULPIT TO RETAKE CHARGE, I URGE YOU BOTH TO SIT ELDER WILLIAMS DOWN, AS YOU KNOW YOUR CERTIFICATE IS FRAUDULENT & GIVE HIM NO LEGAL AUTHORITY!

External
Inbox

Moses Tyson Jr <mosestysonjr@hotmail.com>

Attachments

Sat, Sep 6, 3:01 PM

to Bishop, c.h.mcclelland@sbcglobal.net, faithtalker@sbcglobal.net, pastorgwjsr@gmail.com, Robert, pastorjwm@aol.com, plwsr@nc.rr.com, Michael, Larry, Mother, Bishoprljones@comcast.net, Felicia, Pastor, kenneth, Clarence, robert, Bishop, bishopjlkj@gmail.com, yamscenter@gmail.com, alrivers@comcast.net, Douglass, dbogan1710@comcast.net, dlinwood2002@yahoo.com, dlockwoods@gmail.com, Bishop, pastorjlogan@gmail.com, scirater, Earl, lfthouston@gmail.com, bbporter@bellsouth.net, me, Supt, Cedric, Quay, Bishop, Frances, Herbert, greaterpaget@gmail.com, highwaycogic@aol.com, supvbml@aol.com, Andrew, Andre, roncogic@aol.com, Zack, 2733, jarius@sbcglobal.net, rdmott, Bishop, dutchessherrod@aol.com, jameswright41@aol.com, Michael, markways@aol.com, coogary1@aol.com, Bishop, Ford, George, Chief, Peter, Chairman, normanharper@comcast.net, Terrance, Alfred, elderchrisedwards@gmail.com, Bishop, dwightewallssr@yahoo.com, bishopdwightgreen@yahoo.com, Bishop, JeVon, Darrell, Javier, jackie, david, Davis, Elijah, Prince, Adrian, htops@att.net, Bishoplmwooten@sbcglobal.net, carlunity@aol.com, Carlin, Jubbar, GWENDOLYN, gwesleyhardy2@gmail.com, K, RON, Gregory, libertywsw@aol.com, bishop, Elder, Kym, Chandra, nbullock1476@comcast.net, Leslie, ERIC, Roland, pastordrjohnson@yahoo.com, pastordherron@aol.com, Darnell, holytabernaclepatx@gmail.com, Frank, leslie.reese82@gmail, Barbara, Mark

Dear Presiding Bishop Sheard & Bishop McClelland:

I pray you are well sirs. Please see the below email thread and attachments regarding Bishop Sample's return to Holy Tabernacle's pulpit, as well as to his office, that Bishop Sheard, you locked him out of, per the gentleman said to us, when I was there a couple of weeks ago. God willing, Sept 28th, we will be putting Bishop Sample back up before the saints so he can fulfill his "GOD GIVEN" instructions for the next phase of his life and ministry.

I urge you both, to pull the plug on Elder Williams and those you empowered to undermine the sitting President/ Pastor of HTC, Bishop Sample for the past 6 months or so. All monies spent, without Bishop Sample's authorization, must be replaced or will be reported as Grand Theft to the proper authorities. Both of you KNOW, you had NO SUCH authority to issue phony CERTIFICATES to any 3rd party, in a local non profit organization, that led to ILLEGAL EXPENDITURES, the President's salary being withheld, and even worse, you LOCKING OUT, the FOUNDER, and current Pastor/ Bishop & President of HTC, Bishop Sample. A FATHER!

God bless you and please be advised that I am in no way afraid of anything you may try to do. I only urge you NOT to send no GOONS to HT, trying to block Bishop Sample from carrying out his duties

as Pres/ Pastor of HTC. If you do, they will be met with law enforcement and we will FILE every appropriate criminal charges against you all, for once again TRYING TO STEAL control of another non profit organization, using FRAUDULENT BULLYING TACTICS! Thankfully, the many saints who have reached out to me, BELIEVE what I have said in the video uploads, and there is plenty more information to come. I regret Bishop Sheard, you refused to change course and just walk up RIGHTEOUSLY in these matters.

I am beginning to believe that maybe we do need TERM LIMITS, of no more than 8 years for our Presiding Bishops, moving forward. I would hate for you to be IMPEACHED, as there are "LEGITIMATE CHARGES" filed against you as you know in this matter, and West Side may be forced to do so as well, given you left them with more than \$300,000.00 in legal fees, a destroyed rental home & over 3 years of back rent to Sis. Huff, in COGIC INC'S, YOU & GEN COUNSEL SAFFOLD'S "FAILED ATTEMPT", to steal control of West Side 3 paid for properties, and their ministry. I remind you sir, the JUDGE said in her dialogue as she ruled in West Side favor, that you all "were DISENGENUOUS" with her court!

Lastly sirs: I HAVE GEN SECRETARY BISHOP RUDOLPH ON COPY AND HE CAN AFFIRM THAT NO LETTER HAS BEEN OFFICIALLY SENT TO HIS OFFICE BY BISHOP SAMPLE OR HIS FAMILY REQUESTING EMERITIZATION AS BISHOP OF TEXAS NORTH CENTRAL! GIVEN THE CONFUSION YOUR ACTIONS HAVE CAUSED, I WILL SPEAK TO HIM SUGGESTING HE SHOULD SEND IN AN OFFICIAL LETTER, PUTTING SUCH REQUEST ON HOLD! Again, Bishop Rudolph has yet to send me any information showing where such request was Officially made in writing, per the rules. Given all of the deception that resulted in just Bishop Sample just discussing such a move, forces me to have to do all I can to just "SCRAP" any further discussions at this time, until "AFTER", HTC is resolved! Supt. Jones sir, this is no slight on you, however I am sure you would not want to assume the Jurisdiction under such a CLOUD OF FRAUD, GRAND THEFT & ABUSE, of the FOUNDER, Bishop Sample, would you sir?

Respectfully,
Moses Tyson Jr

CC: ALL DESIRED PARTIES!

From: Moses Tyson Jr <mosestysonjr@hotmail.com>

Sent: Saturday, September 6, 2025 12:10 PM

To: robert sample <pastorsample@gmail.com>; Leslie Reese <leslie.reese82@gmail.com>; Mark Sample <marsam1@gmail.com>

Cc: pastorjwm@aol.com <pastorjwm@aol.com>; plwsr@nc.rr.com <plwsr@nc.rr.com>; Michael Hill <mh.kingdom@gmail.com>; faithtalker@sbcglobal.net <faithtalker@sbcglobal.net>; Larry Shaw <bishopllshaw2671@gmail.com>; Mother L. Kyles <firstladik@aol.com>;

Bishoprljones@comcast.net <bishoprljones@comcast.net>; Felicia Watts

<drfeliciawatts22@gmail.com>; Pastor Kenneth Watts - Pensacola

<pastorkennethwatts15@gmail.com>; kenneth faisou <kencares4u@yahoo.com>; Clarence

Sexton <pastorcls@yahoo.com>; Bishop John Richardson <pastorjmr3@msn.com>;

bishopjlkj@gmail.com <bishopjlkj@gmail.com>; yamscenter@gmail.com

<yamscenter@gmail.com>; alrivers@comcast.net <alrivers@comcast.net>; Douglass Smith

<dsmith3894@gmail.com>; dbogan1710@comcast.net <dbogan1710@comcast.net>;

dlinwood2002@yahoo.com <dlinwood2002@yahoo.com>; dlockwoods@gmail.com

<dlockwoods@gmail.com>; Bishop Donald Murray <bishopdrm@yahoo.com>; Bishop Drew

Sheard <jsh5948740@aol.com>; M; lfthuston@gmail.com: BISHOP SAMPLE: GOD WILLING SIR, I WILL BE BACK TO FORT WORTH TO FACILITATE YOUR VETO, PRESENT YOU AS PRES/ PASTOR OF HTC ON THE 4TH SUNDAY OF SEPT! IF THE PB DO NOT SIT ELD WILLIAMS DOWN, LAW ENFORCEMENT WILL

Dear Bishop Sample:

I pray you are well sir. I am sending you this communication to let you know that God willing I be back in Fort Worth with you the week of Sept, 22nd, 2024, so that you can return back to your office, and on the following Sunday, Sept 28th, I will personally "play the sermonic solo" after I present you as Pres/ Pastor of HTC, to speak to the people. I am convinced that the membership has had enough time to "REVIEW", the video footage we have uploaded, showing the "FACTS" related to your Legal Status as Pres/ Pastor of HTC, as well as proving that you have not as of "YET", been granted emeritus status by the General Assembly, as the process has not even legally started, per the "rules".

Below sir, as you can see, is just some of the communications I have had with various people within our COGIC ORG, while we have been waiting for the saints to review the videos we have uploaded. COGIC INC, in my opinion is a "GREAT IDEA", but sadly as you now know for yourself, the agenda has been perverted, by too individuals who clearly do not have the "INTEGRITY", needed I believe to "LEAD GOD'S PEOPLE". I thank God for men like you, who have walked upright and in the "reverence and fear" of "GOD"! I am honored to have had the privilege to serve you as you "OBEY GOD", and turn over the Mantle, to Pastor Seth! After hearing him and seeing him I can understand why he is "CHOSEN".

I have and continue to ask our Presiding Bishop and or Bishop McClelland to rescind Elder Williams appointment as Pastor, due to the fact that the document is "ILLEGAL". Not only that, if he has caused any monies to be spent while we reestablish your Legal Positions, such monies will have to be paid back, or reported as stolen to the proper authorities, as you are President of HTC, and your approval would have been needed for such expenditures. God willing, we will get back into your office during the weekdays prior to Sept 28th. That way if there are any issues with anyone trying to thwart your legal authorities, we can have such individuals restrained. I pray that it does not have to come to that, but you will NOT be disrespected sir.

Bishop Sample sir, I will call to reaffirm these dates, with Elder Reese, Bro. Mark and Sis. Barbara, so that we can announce this to the people who are awaiting closure to this matter. I have received so many calls from around the country. Bishops included, who are praying for you and all involved in this debacle. I have told the Bishops, of my disappointment in them watching you be so abused, and their "FEAR", to stand against such cruel behavior? Many Pastors are worried now as well, because "IF" COGIC INC, Officials "tried to steal your legal positions and control of HTC", what will they do to them? I have already started to have conversations with intelligent people, in order to present to our local congregations a "template" of information, making sure their BY-LAWS, spell OUT, NO LEGAL RELATIONSHIP WITH COGIC INC, and their local non-profit organizations, whatsoever!

We will recommend they spell out; the association with COGIC INC, is basically attending various " NATIONAL CONVENTIONS & PAYING DUES"! In addition, they best make sure there is NO TRUST CLAUSE associated with Memphis Headquarters, be NOWHERE NEAR their paperwork. Just like

with HTC by-laws, they clearly spell out, HTC is a "STAND ALONE"! NO GOVERNANCE BY COGIC INC, so just that alone, nullify any document Bishop Sheard or Bishop McClelland gave to Elder Williams. I am really baffled as to why Bishop Sheard has failed to see the wisdom to pull the plug now and save the embarrassment their illegal actions will bring.

In closing sir, I look forward to facilitating the Official public Installation of your successor. We can discuss all of this, prior to my return to Fort Worth. Thanks again Bishop Sample, for "trusting me" enough to assist you in this most "SACRED" matter. You are one of our "TREASURED FATHERS", and I apologize for the mistreatment you have experienced; HOWEVER, I am convinced that "GOD" may have allowed it, in order to expose the abusive culture that permeates within our organization, in such matters. Paid for properties, worth Millions of Dollars, money in the bank & then National Officials conspire to illegally gain control of the SPOILS, to divide among "disqualified people". God has his way of EXPOSING AND CLEANING UP, corruption, and I am sure YOUR NAME, will be called when those coming behind us, read how you took a "COURAGEOUS STAND", against those who tried to "BLOCK THE DIRECTIVES" GOD, gave to you, as you move into the next phase of your life & ministry. I love and respect you sir!

Sir, I urge you to read the information below just so you can see, "YOU ARE NOT ALONE", but your case is very- unique. This is basically just attempted "GRAND THEFT" to me, in so many ways! However, I know RIGHTEOUSNESS WILL PREVAIL! I have spoken to the Presiding Bishop and will continue to admonish him, to do the right thing, for himself, the saints & the National Organization, SIT ELDER WILLIAMS DOWN NOW!

Respectfully,
Moses Tyson, Jr
CC: ALL DESIRED PARTIES!

EXHIBIT 7

GEN COUNSEL SAFFOLD: PLZ SEE SUN NITE INTERVIEW WITH THE JUICE TALK SHOW & PLZ AFFIRM OR NOT IF MY "VIEWS AS TO OUR LEGAL SET UPS" ARE CORRECT, AS IT RELATES TO THE NON AUTHORITY COGIC INC HAS OVER LOCAL CHURCH NON PROFIT ORGANIZATIONS!!!!

External
Inbox



Moses Tyson Jr <mosestysonjr@hotmail.com>

Wed, Oct 29,
2:35 PM (6 days ago)

to me, lfthuston@gmail.com, Chairman, Bishop, Bishop, Bishop, pastorjwm@aol.com, Clarence, Elijah, bbporter@bellsouth.net, dlinwood2002@yahoo.com, c.h.mcclelland@sbcglobal.net, Gerald, Kym, plwsr@nc.rr.com, Elder, Felicia, Jay, normanharper@comcast.net, alrivers49@gmail.com, GRAYLING, nbullock1476@comcast.net, scirater, yamscenter@gmail.com, Darnell, Bishop, kenne th, pdjefferson@gmail.com, gwesleyhardy2@gmail.com, Herbert, Herbert, greaterpaget@gmail.com, Darrell, Dorothy, Jubbar, Bishop, Larry, jameswright41@aol.com, carlunity@aol.com, Carlin, Peter, dwightewallssr@yahoo.com, Chief, rdmott, jarius@sbcglobal.net, Pastor, wjbillups2013@gmail.com, Douglass, pastordherron@aol.com, Chandra, dbogan1710@comcast.net, pastorjlogan@gmail.com, JeVon, Bishop, bishop, Sybil, Shouting, Prince, mjenkins25250@yahoo.com, Terrance, Zack, K, Frank, dlockwoods@gmail.com, BISHOP, Charles, drcurtisedaniel@gmail.com, Mother, prayertabernacle@aol.com, libertywsw@aol.com, Bishoprljones@comcast.net, Ford, Roland, supvml@aol.com, Earl, coogary1@aol.com, Ill, Frances, Michael, Pastor, highwaycogic@aol.com, Timothy, bishopjlkj@gmail.com, GWENDOLYN, Gregory, Leslie, Mashona38@yahoo.com, bishoproydixon.4th@gmail.com, Bishop, Cedric, Quay

<https://youtu.be/kDfuxaiUOS4?si=m4TmG8oLfQuwB7-y> (CLICK ON LINK TO SEE SUN NITE THE JUICE TALK SHOW INTERVIEW WITH MOSES TYSON JR)!

Dear General Counsel Saffold, Chairman Bishop Thuston, Chairman Micheal Eaddy, Sec Bishop Porter, Chairman Bishop Murray & Bishop Kyles:

It is so sad to me that rather than the National Church working together with those of us who "KNOW" the legal realities as it relates to who control local church organizations "business", our Leadership has chosen to rather and "TRY AND DESTROY" me, for just sharing my understanding and "FACTUAL" knowledge in the matter. God willing, tomorrow evening 7:30 PM, EST, ***I will be giving an in-depth interview with The Juice Talk Show, via YouTube/ Facebook.***

Chairman Eaddy, unfortunately your role in Bishop Kyle's "ABUSE", there in Houston Texas forbids me from asking for your help, in making sure our people "KNOW" their RIGHTS. ***However, thankfully we have "BLOGGERS" who are concerned about some of the "ABUSE" they are witnessing in COGIC, via King Jives & the late "Cussing Pastor's", consistent shedding light on various abuse cases.*** Now as you will see, I will expand my social media base and go to CNN and or other networks, "AFTER", I am sued by COGIC INC, per the pending DRAFT being "FILED", by Gen Counsel Saffold's, The Presiding Bishop & General Board's attorney, there in Memphis. In fact, I told Mr. Bailey, I would pick up the LAWSUIT, next week since I will be in Memphis, God willing.

In fact, there is NOTHING, that can "STOP" a "LOCAL PASTOR" and or "CEO/PRESIDENT", of a "LOCAL CHURCH ORG", from appointing a "leading Pastor", of their church, WITHOUT ANY BISHOP signing off on the Action. The Jurisdictional Bishop is really just a "SUPERVISOR" for the National Organization, whose primary job is to "COLLECT DUES", and of course "MANAGE" as best they can to keep a "GRIP", over local congregations for the National. However, in the end, IT'S ONLY A FELLOWSHIP RELATIONSHIP!!!!

As it relates to "SUCCESSIONS", as you will see we are going to "STRESS", the need for us all to talk about WHO TAKES OVER when the Leader Dies. Usually, and especially because we have so many small Jurisdictions, the "successor" is already sitting in the local church. Why not poll the members periodically, to see who they "see as a successor". Would not the members KNOW, who they feel is best to "FEED THEM" their "WORD"? Would not they know best, who they could "TRUST" to be their counselor in the time of trouble, better than a 3rd party outsider? These are conversations that hopefully our FORUMS, that we are going to set up, will engage in, so our people can be helped in an organized and concise way.

Many members have no clue as to how their "DEEDS" are set up. I have experiences where when the Pastor died, the church was paid for by the people, but the DEEDS were not in the Church's name, and the family "threw out the congregation" and sold the property. This ought not be. Sis. Jackson in Little Rock Ca, lost their local church property as it was sold, by the replacement pastor, appointed by the Bishop. When they went to the Bishop for help, he ignored their plight, and now their paid for church has been SOLD and they now worship "online".

The West Side matter, which is yet ongoing, given Bishop Green's lawsuits against me and others, and the fact that he lost already on the majority of them, but is now appealing to my understanding: ***that entire case was the result of "FRAUD, LIES & ABUSE", by our Leadership & you Gen Counsel Saffold.*** The files can easily prove my factual statement. ***In fact sir, you all asked the "COURT" to throw West Side Local Membership and the CEO/ PASTOR, Elder Watts out of "THEIR LOCALLY OWNED PROPERTY", and told the court, COGIC INC, OWNED THE PROPERTIES! Yet, I have a text from you, where you "AFFIRMED" that you "KNEW" COGIC INC, do not own our local church properties. Due to the "LIES" you all involved filed in court, West Side's legal bills are way in excess of \$350,000.00 right now, and you all refused to pay it, per the MRC report, where such actions were possible.***

General Counsel Saffold sir, I regret rather than just be honest, OUR LEADERSHIP chose to continue down the "FRAUD ROAD" and then use "INTIMIDATION TACTICS" to try and "SHUT UP" those who are not afraid to "STAND ON TRUTH". The cops were called on me in Fort Worth when the Legal Pastor, Bishop Sample invited me into his local church office, and the "FRAUDULENT APPOINTMENT PAPER", the Presiding Bishop & Bishop McClelland gave to the Elder, LYING SAYING he is the Pastor of Holy Tabernacle, was used to secure a fraudulent CTW against me, of which I have had to retain an attorney to get it lifted, by showing that INDEED, you Gen Counsel Saffold, Bishop Sheard & Bishop McClelland, actions are indeed "ILLEGAL, FRAUDULENT & DOWN RIGHT WICKED. This should NOT be happening, but because in my opinion, your consciousness is "WAXED FROZEN", you fell nothing of the ABUSE you are engaging in against Bishop Sample, nor Bishop Kyles. There are others, but them are the main two, I am focused on right now in this note to you!

Anyway, God bless you all, and "IF" anything I said in this attached interview is not correct, PLEASE let me know, so I can correct it. I am making "SÛRE" that my statements are backed by the "LAWS & LEGAL DOCUMENTED BEHAVIOR", of those involved in these various "UNGODLY MATTERS". Again, Gen Counsel Saffold sir, I will pick up the Lawsuit next Week in Memphis, should you desire so we can "GET IT OVER WITH" asap. I think by going to a FEDERAL COURT, such an action will "ASSIST", in making sure OUR PEOPLE get the INFORMATION on how to protect themselves, from 3rd Party Local Church Properties & Local Non Profit Organizations, "PREDATORS".

Chairman Bishop Thuston sir: I think it's time we tell the "SAINTS THE TRUTH". Bottom line, a local church DO NOT NEED a "BISHOP" to appoint a PASTOR, especially when a "REPLACEMENT" is the issue. "OF COURSE", I am not suggesting wiping that out, BUT it is not a MUST! The local church non-profit organization as you well know sir, has no LEGAL TIES, to Memphis Inc. No National Officers are on the bank accounts, deeds or bills and they have no responsibility for the SOLVENCY of the local churches !

In fact, sir, other than "FOR THE RIGHT TO VOTE" in the GA, a Pastor don't even have to have a COGIC CARD. I say that as it relates to the LEGAL RELATIONSHIP between the local church organization of which the Pastor may also be the CEO/ PRES of the non-profit local church organization. In other words, the CEO & PASTOR could be 2 different people. It's time we "TELL THE SAINTS THE TRUTH", so we can avoid and minimize future damages to others. I had been hoping for the last many years we could work together on "educating our saints", but some of you wanted to keep the "OPPESSION APPROACH", it appears. I look forward to going to the FEDERAL COURT, so we can finally hash these "FACTS OUT". Gen Counsel Saffold, I believe is going to see once and for all, I am not spreading ERONEOUS INFORMATION, but LEGAL FACTS! Right now, is a Local Membership, along with their Board of Directors/ Trustee Board, voted to make "THEIR DRUMMER", the PASTOR, COGIC INC, Officials, have NO LEGAL RIGHT to stop THEIR ACTIONS~! Let's go see the Judge and test out these "FACTS"!

EXHIBIT 8

**IN THE CHANCERY COURT FOR THE THIRTIETH
DISTRICT OF SHELBY COUNTY, TENNESSEE**

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.

AFFIDAVIT IN LIEU OF TESTIMONY

BEFORE ME, the undersigned authority, personally appeared JONATHAN SAFFOLD, JR., who, upon being duly sworn, deposes and states the following based upon his own personal knowledge:

My name is Jonathan Saffold, Jr. I am over the age of eighteen (18) and competent to testify to the matters set forth herein. My address is [insert full address], and I am the duly appointed General Counsel of the Church of God in Christ, Inc. ("COGIC"), headquartered in Memphis, Tennessee.

In my capacity as General Counsel, I am responsible for overseeing and managing all legal affairs of COGIC nationwide, including property litigation, ecclesiastical disputes, intellectual property protection, and compliance with corporate and charitable regulations. My position requires the highest degree of honesty, professional integrity, and trust, both as an attorney and

as an ecclesiastical officer.

Beginning in or around August 2025, I became aware of multiple false, malicious, and defamatory statements being circulated by Mr. Moses Tyson, Jr. through emails, social media posts, and online videos, directly naming me and accusing me of committing serious crimes, including fraud, grand theft, perjury, and elder abuse.

In one such email sent on or about October 24, 2025, Mr. Tyson expressly accused me by name, stating that the "General Counsel Saffold" and other COGIC officials had "lied to police and courts," "cut and pasted fraudulent letters," and "engaged in grand theft and abuse" relating to church property disputes and the Holy Tabernacle Church transition.

These statements are categorically false. Neither I, nor any official of COGIC, has engaged in any illegal or unethical conduct in connection with Bishop Robert L. Sample, Holy Tabernacle Church, or any related matter.

Mr. Tyson's statements were published to a national and international audience, including other bishops, clergy, and members of the Church, as well as the general public via YouTube and email dissemination lists reaching thousands of recipients. The defamatory accusations were also directed to and copied to individuals within the legal community, including pastors, attorneys, and court officials who have ongoing professional dealings with COGIC.

As a licensed attorney and officer of the court, my professional reputation and credibility are central to my ability to serve as General Counsel and to advise the national leadership of COGIC. Mr. Tyson's repeated public accusations of criminality and dishonesty directly attack the integrity essential to my legal profession.

Because Mr. Tyson's accusations include allegations of felonious conduct, fraud, and dishonesty in my profession, they constitute defamation per se under Tennessee law. Injury to my reputation is presumed, and I have in fact suffered reputational harm and emotional distress as a result.

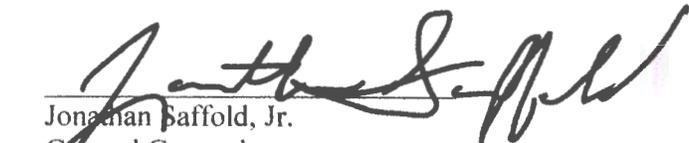
Following the dissemination of Mr. Tyson's statements, I have been questioned by colleagues, bishops, and members of the public concerning the false accusations, resulting in reputational embarrassment and interference with my ability to carry out my duties. These inquiries have required me to issue clarifications and responses to preserve the credibility of the Church's legal department.

I have personally observed the negative impact of Mr. Tyson's publications within the COGIC community. His false statements have eroded trust in Church governance, disrupted lines of authority, and caused confusion and discord among congregations.

Mr. Tyson's conduct has caused irreparable harm to my personal reputation, professional standing, and to the institutional integrity of the Church of God in Christ, Inc. The ongoing nature of his defamation continues to injure both myself and the organization I serve.

I make this affidavit in support of COGIC's Complaint and Motion for Temporary Restraining Order and Preliminary Injunction filed against Moses Tyson, Jr., and affirm that the statements contained herein are true to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

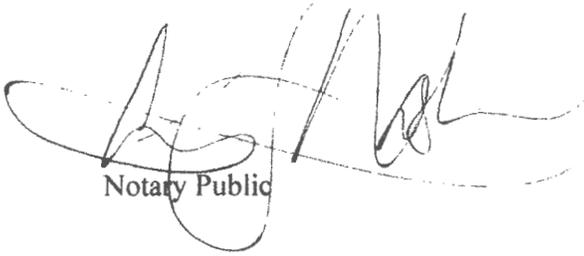

Jonathan Saffold, Jr.
General Counsel
Church of God in Christ, Inc.

STATE OF TENNESSEE

COUNTY OF SHELBY



Subscribed and sworn to before me this 5th day of November, 2025, by Jonathan Saffold, Jr., who is personally known to me or who produced valid identification.



Notary Public

My Commission Expires: 8/9/2025

EXHIBIT 9

STATE OF FLORIDA

COUNTY OF GADSDEN

AFFIDAVIT IN SUPPORT OF COGIC IN OPPOSITION TO MOSES TYSON, JR

BEFORE ME, the undersigned authority, personally appeared, WILLIE C. GREEN, who upon being duly sworn states the following of his own personal knowledge:

1. My name is Willie C. Green. I live at 296 Bradwell Road, Quincy, Florida 32351.
2. I am over the age of eighteen.
3. I am giving this Affidavit in support of the Church of God in Christ (COGIC) and in opposition to Moses Tyson, Jr.
4. I am a member of COGIC's Board of Bishops (BOB), serving as the Jurisdictional Bishop of The Ecclesiastical Jurisdiction of Florida Northwest COGIC, Inc. with churches in North Florida and South Alabama.
5. I pastor Quincy and Community Deliverance COGIC, Inc. in Quincy, Florida and Easthill COGIC, Inc. in Pensacola, Florida.
6. I have personal knowledge about the facts in the case being brought against Moses Tyson, Jr. by COGIC.
7. Mr. Tyson copied me on some of the text messages, emails, and videos that he published on social media accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing crimes including "being thieves", "grand theft", "fraud", and "elderly abuse". He also published some of these statements on a platform known as "King Jives".

8. I read and/or heard Mr. Tyson making statements accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing the crimes listed above.
9. I have personal knowledge that pastors, members, and other people in my jurisdiction and local church have seen and heard the above statements made by Mr. Tyson accusing COGIC, Bishop Sheard, BOB, and other COGIC leaders of committing the crimes listed above.
10. Based on my personal knowledge, membership and income in my local churches and jurisdiction have declined as a result of the above statements made by Mr. Tyson.
11. Some members and visitors to my church have told me that they left or will not come back as a result of the statements made by Mr. Tyson. Others have stated that they have a negative view of COGIC and Bishop Sheard as a result of Mr. Tyson's statements.
12. One of my members, who lives in Lakeland, called and told me that he had seen the statements made by Mr. Tyson and that they gave him a negative view of COGIC and Bishop Sheard.
13. One person, who was a frequent visitor and supporter of my church, told me that she will not attend any more COGIC functions because she does not trust Bishop Sheard.
14. Other pastors in Florida have reported to me that Mr. Tyson's statements about COGIC have caused declines in their church attendance and membership.

I understand that I am swearing or affirming under oath and under penalty of perjury to the truthfulness of the claims that I have made in this Affidavit.

I affirm or swear that all of the above statements are true to the best of my knowledge.

Done this 26th Day of October 2025

Willie C Green

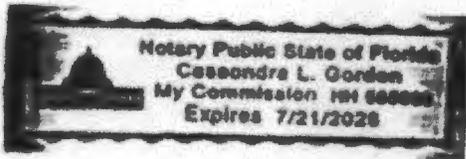
Signature

Willie C Green
Printed Name

STATE OF FLORIDA

COUNTY OF GADSDEN

The Foregoing instrument was acknowledged before me this 26th day of October 2025 by
Willie C. Green, X who is personally known to me or who produced Driver's License
as identification.



Cassondra L Gordon

Signature of Notary Public

Cassondra L Gordon
Notary Public

Commission - HH 565803
My Commission expires 07/21/2028