

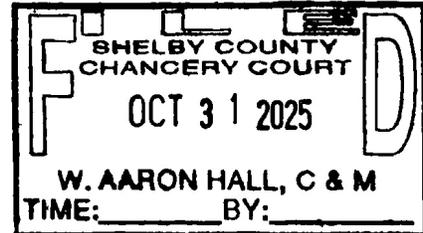
**IN THE CHANCERY COURT FOR THE THIRTIETH  
DISTRICT OF SHELBY COUNTY, TENNESSEE**

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

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

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



**Plaintiffs,**

**vs.**

No: CH-25-1651  
Part I

**MOSES TYSON, JR.**

**Defendant.**

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**COMPLAINT FOR DAMAGES AND FOR INJUNCTION**

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**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.

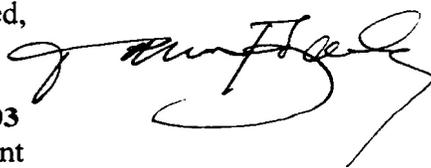
**C. Awarding Punitive Damages** for Defendant's malicious, willful, and reckless conduct.

**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 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 26<sup>th</sup> Day of October 2025

Willie C Green

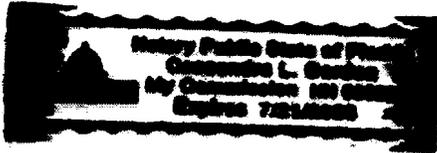
Signature

Willie C Green  
Printed Name

STATE OF FLORIDA

COUNTY OF GADSDEN

The Foregoing instrument was acknowledged before me this 26<sup>th</sup> 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

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@cogic.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@cogic.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](http://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,