

**CHURCH OF GOD IN CHRIST, INC.  
GENERAL ASSEMBLY**

U.S. Constitution, Article 1, Section 2: the House of Representatives shall have the sole power of impeachment. And under Section 3 of the same article the Senate shall the sole power to try all impeachments.

Impeachment is a legal action brought against a government official accused of misconduct or criminal offenses. In the United States the House of Representatives brings charges for impeachment by a majority vote. Then the Senate, if by two-thirds majority vote, finds the impeached officer guilty, he is removed from office.

Order: The Judiciary Board Of The Church Of God In Christ, International, Inc. on April 4, 1990 upon the recommendation and report of the Church of God in Christ General Assembly's Committee on Constitution, pursuant to the Constitution of the Church of God in Christ, Article VIII, Judiciary Board, that:

“The nine members of the Judiciary Board are elected and retained in office by the legislative branch of church government, the General Assembly . . . .”

*An Introduction to Biblical Apologetics for the establishment of the Judiciary Board of the Church of God In Christ*, 1990, p. 14, states:

“The legislative branch can . . . impeach . . . . It can investigate . . . activities . . . . of the judiciary; . . . .”

The Presiding Bishop (chief executive officer) has the prerogative to pardon a person (official) however he cannot pardon an official when a judgment of impeachment has been ruled by the legislative branch and upheld in the Judiciary branch. The legislative branch has the power to impeach church government officials.

The text of the Judicial Code of Conduct is authoritative, Canons 1, 2 and 3 will herein be discussed as well as the specific violations committed by Justice Warren-McKinney, Justice Perry, Justice Clemmons, Justice Slack and Justice Hammonds.

Procedural posture must comply with prerequisites set forth in : *Matthew 18:15-17* and *II Corinthians 13:1*.

Justice Warren-McKinney, Justice Perry and Justice Clemmons should be impeached and removed from office.

Justices Warren-McKinney and Perry failed to comply with Canon 3 (c) even after herein Petitioner's submitted its Motion To Disqualify them.

**CHURCH OF GOD IN CHRIST, INC.  
GENERAL ASSEMBLY**

**IN RE: PETITION FOR IMPEACHMENT** )  
 )  
 **OF** )  
 )  
 **ASSOCIATE JUSTICE, BARBARA J. WARREN-MCKINNEY** )  
 )

---

*Filed Pursuant To Article VIII*

**PETITION FOR IMPEACHMENT**

Comes Now, Emmitt Taylor of Wichita, Kansas, a delegate in good standing in the Church of God in Christ, hereinafter referred to as Petitioner and files this **Petition For Impeachment,** against Associate Justice Warren-McKinney for grievous constitutional violations committed by her personally and in her official capacity. Petitioner has just cause to believe that the Associate Justice has violated the following specific constitutional provisions **Code Of Judicial Conduct**, Canon (s) 1, 2 (a) and (b), 3, C (1) (b) (c) and (d). Petitioner files this petition pursuant to the *Constitution*, Article VIII, Judiciary Board, Term Of Office, paragraphs 3, B, 1 (a) & (b) which states the following:

(3) “A Judiciary Board member may be removed from office prior to the expiration of his term due to incapacitation, in competency (*sic*) or for the commission of acts in violation of the Constitution of the Church of God in Christ.”

(B) “Procedure for filing and handling charges.”

(1) “A delegate in good standing of the Church of God in Christ having just cause to believe that a member of the Judiciary Board has committed an act repugnant to the Constitution of the Church of God in Christ may file a charge.”

(a) “The written petition shall be filed in the office of the secretary of the General Assembly specifically setting out the charges and things complained of, and copies shall be filed with the secretary of the Judiciary Board.”

(b) “Every petition shall be signed by the individual making the charge, whose address shall also be stated. His signature constitutes a certificate by him that to the best of his knowledge, information and belief, there is good ground to support the charge.”

## I.

Associate Justice, Warren-McKinney, was elected to the Church of God in Christ, Judiciary Board by the General Assembly in November 2004 and 2006 and currently resides in California.

## II.

The Judicial Code, the Code of Judicial Conduct is a mandated addendum or addition to the Church of God in Christ, *Constitution*.

“Article VIII, under subtitle, Organization And Procedure, provision three, mandates that it is the Judiciary Board who shall, with the approval of the General Assembly, prepare and keep in revision a Judicial Code which **shall be an addendum to the Constitution of the Church of God in Christ . . .**”  
*An Introduction to Biblical Apologetics for the establishment of the Judiciary Board of the Church of God in Christ, A Judicial Code Is Mandated, p. 1 (bold face added).*

The Judicial Code, hereinafter referred to as the Code of Judicial Conduct was adopted in April 1993, and is comprised of canons (rules, standards) which the justices are to comply with and adhere to in carrying out and performing their judicial duties, responsibilities.

“All justices should comply with this Code . . .” Compliance With The Code Of Judicial Conduct. *An Introduction to Biblical Apologetics for the establishment of the Judiciary Board.*

### III.

Further, pursuant to Canon 2 (A) Justice Warren-McKinney had a duty to:

“ . . . respect and comply with the Church’s constitution, amendments, by-laws and all appendices . . . .” Code of Judicial Conduct Canon 2 (A)  
(See Exhibit 1)

### IV.

On or about November 28, 2004 Emmanuel Church of God in Christ, Wichita, Kansas, submitted a jurisdictional transfer request to the General Secretary and the respective jurisdictional bishops of Kansas Southwest and Kansas Central. Subsequent to the transfer request a meeting was held on or about December 4, 2004, at St. Mark Church of God in Christ in Wichita, Kansas. At the request of Enoch Perry and with the consent/request of Bishop Gilkey, Justice Warren-McKinney attended the meeting in Wichita, Kansas in December 2004. Elders Ronald Stidham and Donald McIntyre attended the meeting on behalf of the local church Emmanuel. The November 2004 transfer was discussed and at that time Justice Warren-McKinney acted as an adviser to and advocate for Bishop Gilkey and Kansas Southwest.

Justice Warren-McKinney, had recently been elected to the Judiciary Board in November 2004, she was to serve the remainder of her predecessor’s term. She was presented as an officer from the National Church. Justice Warren-McKinney ran for re-election in 2006 and appeared before and was interviewed by the national candidate screening committee. It is widely known that a well functioning committee would have to question each candidate with respect to their proven ability (their past track record);

which would include questions regarding prior ecclesiastical jurisdictional contacts and involvements. By her candidacy, election, installation and service Justice Warren-McKinney agreed to disqualify, recuse herself in matters that she had prior contact or involvement.

Emanuel's transfer request by mediated agreement was submitted to the Church of God in Christ, Inc. in March 2008. The General Board denied the transfer request in May 2008. The transfer matter was appealed to the Judiciary Board in May 2008 and a hearing on the matter was held before the judiciary on September 23, 2008; however Justice Warren-McKinney did not disqualify (recuse) herself, as she had previously agreed. In May 2008, she had a duty to disqualify herself because she had served as an adviser/counselor to Bishop Gilkey and Kansas Southwest in the Emmanuel transfer matter, the matter in controversy. Code of Judicial Conduct, Canon 3, C, (1) (b) states:

“A justice should disqualify himself/herself in a proceeding in which his/her impartiality might reasonably be questioned, including but not limited to instances where: he/she served as counselor in the matter in controversy . . . .”

yet Justice Warren-McKinney failed to do so.

## V.

Prior to sitting on the Judiciary Board, Justice Warren-McKinney worked in the Office of the General Counsel with Enoch Perry. This same Enoch Perry appeared before the Judiciary Board in the Emmanuel transfer matter as a material witness on behalf of Kansas Southwest and Bishop Gilkey. Enoch Perry testified without a subpoena in the civil district court in Wichita, Kansas in April 2005, and in November 2006 she was

informed of his prior testimony in the civil court.

Justice Warren-McKinney is a licensed attorney and as such knew or should have known that Enoch Perry would be a material witness in the transfer matter before the Judiciary Board. She was required to constitutionally disqualify herself because she (practiced law) worked in the Office of the General Counsel, with Enoch Perry who was and is the General Counsel for the Church of God in Christ and at that time most likely her supervisor. Code of Judicial Conduct, Canon 3, C, (1) (b) states:

“A justice should disqualify himself/herself in a proceeding in which his/her impartiality might reasonably be questioned, including but not limited to instances where: he/she served as counselor in the matter in controversy, or a counselor with whom he/she previously practiced law served during such association as a counselor concerning the matter, or the justice or such counselor has been a material witness concerning it”;

yet Justice Warren-McKinney failed to do so.

## VI.

On or about August 9, 2008, Justice Warren married General Board member Bishop George McKinney. It was common knowledge amongst all justices that the local church Emmanuel submitted its transfer request to the Church in March 2008 and that the General Board denied the transfer request in May 2008. It is reasonable to perceive that her husband had a substantial interest in the General Board's decision being affirmed.

Justice Warren-McKinney was constitutionally required to perform her judicial duties impartially. She was required to disregard the General Board's decision, esteem her judicial responsibilities above the responsibilities and influence of her husband and to

be willing and prepared to take a public stand in opposition to him. It is highly unlikely that she is or was immune from her husband's influence, and the General Board's decision denying the transfer request. Code of Judicial Conduct, Canon 3, C, (1) (c) states:

“A justice should disqualify himself/herself in a proceeding in which his/her impartiality might reasonably be questioned, including but not limited to instances where: he/she knows that . . . his/her spouse . . . has a . . . interest that could be substantially affected by the outcome of the proceeding”.

yet, Justice Warren-McKinney failed to do so.

## VII.

On April 4, 1990, the Judiciary Board was established as an independent third branch of church government designed to exist in conjunction with the executive and legislative branches of government.

“The Judiciary Board's relative autonomy carries with it **special responsibilities** of self-government. Each justice has a responsibility to assure that its judicative (*sic*) regulations are conceived in the interest of all Church of God in Christ members and not in furtherance of parochial or self-interested concerns of any one branch of church government. Every judiciary board member is responsible for observance of the Rules and Ethics of the Judiciary Board.”

“Neglect of these responsibilities compromises the independence of the Judiciary Board and the Church's interest which it serves”. *An Introduction to Biblical Apologetics for the establishment of the Judiciary Board*, Self Government of Judiciary Board,

Justice Warren-McKinney had and has a constitutional duty to maintain and enforce the integrity and independence of the Judiciary. According to the Word of God, Bishop George McKinney and Justice Warren-McKinney are one. In *Matthew 19:5-6 (a)* Jesus states:

“ . . . For this cause shall a man leave father and mother, and shall cleave to his wife: and they twain shall be one flesh? Wherefore they are no more twain, but one flesh”.

It is inconceivable and unconscionable that Justice Warren-McKinney would be constitutionally permitted to participate in the General Board’s determination of the transfer matter and then also participate in the Judiciary Board’s determination and outcome of the same matter. She and Bishop McKinney according to scripture are one. The Judiciary Board held a hearing on the transfer matter in September 2008, and at that time she was married to, one with Bishop McKinney. With full knowledge of her husband’s General Board membership, the May 2008 transfer request denial, her constitutional duty to uphold the independence of the judiciary and Jesus’ words that she and her husband are one; Justice Warren-McKinney failed to disqualify herself.

As a licensed attorney it is highly unlikely that Justice Warren-McKinney lacks the training which enables her to read, apply and comply with the Code of Judicial Conduct. Her failure to respect and comply with her constitutional duty is inexcusable. Even if she were to contend that she did not marry until August 2008, she still had a social relationship and announced her engagement before the marriage. Because it is indispensable to justice, the judiciary must be free to render impartial decisions as mandated by the *Constitution* without being influenced by relationships.

Canon 1, states:

**“A Justice Should Uphold The Integrity And Independence Of The Judiciary.** An independent and honorable judiciary is indispensable to justice in the Church of God in Christ. A justice should participate in establishing, maintaining and enforcing, and should himself/herself observe, high standards of conduct so that the integrity and independence of the judiciary may be

preserved. The provisions of this Code should be construed and applied to further that objective.”

yet Justice Warren-McKinney failed to do so.

### VIII.

Justice Warren-McKinney is and was constitutionally required to avoid impropriety and the appearance of impropriety in all her activities. Canon 2 sets forth the constitutional requirement that:

**“A Justice Should Avoid Impropriety And The Appearance Of Impropriety In All His/Her Activities.** A. A justice should respect and comply with the Church’s constitution, amendments, by-laws, and all appendices thereto and should conduct himself/herself at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. B. A justice should not allow his/her family, social, or other relationships to influence his/her judicial conduct or judgment. He/she should not lend the prestige of his/her office to advance the private interest of others, nor should he/she convey or knowingly permit others to convey the impression that they are in a special position to influence him/her”.

### IX.

In March 2009, it was unclear to the local church Emmanuel, why Justice Warren-McKinney had failed to disqualify herself and comply with the *Constitution*; so the local church on or about March 18, 2009, filed its **Motion To Disqualify Specified Associate Justices**, (See exhibit 2 ). She received the motion on or about March 20, 2009 (See exhibit 3, U. S. Postal, proof of delivery green card); however she continued to defy and or ignore the *Constitution*, as well as the motion.

On May 12, 2009, the Judiciary Board published an opinion dated January 22, 2009, signed by Justice Warren-McKinney denying the transfer. Perhaps Justice Warren-McKinney, a licensed attorney chose to continue to ignore her constitutional duty to

disqualify herself, because she had voted and signed the January 22<sup>nd</sup> opinion; however such an argument is without merit since a justice can withdraw her vote and abstain prior to publication of a decision. Justice Warren-McKinney should have and could have demonstrated respect for the *Constitution* and complied with it, at any time prior to the May 12, 2009 publication; however she failed to do so.

## X.

Canon 3. which states that:

**“A Justice Should Perform The Duties Of His/Her Office Impartially And Diligently”**. *Church of God in Christ, Constitution, Code of Judicial Conduct.*

embodies at its very core *Deuteronomy 1:16, Proverbs 28:21, James 2:1 & 9* which states:

“Ye shall not respect persons in judgment; . . . .”

“To have respect of persons is not good: . . . .”

“My brethren, have not the faith of our Lord Jesus Christ, the Lord of glory, with respect of persons.”

“But if ye have respect to persons, ye commit sin, and are convinced of the law as transgressors.”

Justice Warren-McKinney must not be allowed to merge the executive and judicial branches of church government; the judiciary is constitutionally mandated to remain independent nor must she be allowed to enshrine respect of persons.

## XI.

Justice Warren-McKinney, attended a meeting in December 2004 in Wichita, Kansas and acted as an adviser/counselor to Kansas Southwest and Bishop

Gilkey who later appeared before the Judiciary Board in September 2008 on the same matter. Prior to being elected to the Judiciary Board in 2004, she practiced law, worked in the Office of the General Counsel, with Enoch Perry, who was a material witness on behalf of Kansas Southwest and Bishop Gilkey before the Judiciary Board. She appeared in 2006, before the national screening committee following her prior involvement in the Emmanuel transfer matter and agreed that she would disqualify herself in matters in which she had prior contact and involvement. In 2008, she married a General Board member, with full knowledge of her scriptural oneness, unity with her husband, the General Board's denial of the transfer request and the constitutional mandate of independence with respect to the Judiciary Board, and yet she still failed to respect and comply with the Code of Judicial Conduct, the *Constitution*.

**WHEREFORE**, Petitioner prays that Associate Justice Warren-McKinney's activities and actions in the herein matter be investigated, that this matter be set for trial, and that she be found guilty of the constitutional violations herein stated and impeached, removed from office.

Respectfully submitted,

---

Emmitt Taylor  
Petitioner  
P. O. Box 4622  
Wichita, Kansas 67204

Emmanuel Church of God in Christ, Wichita, Kansas

---

Doris J. Woods, Church Secretary

---

Lois McIntyre

---

Evelyn Echols

---

James S. Rich

---

Jerome Franklin

---

Elder Ronald E. Stidham

**CHURCH OF GOD IN CHRIST, INC.  
GENERAL ASSEMBLY**

**IN RE: PETITION FOR IMPEACHMENT** )  
 )  
 **OF** )  
 )  
 **ASSOCIATE JUSTICE, BARBARA J. WARREN-MCKINNEY** )  
 \_\_\_\_\_ )

**Request For Admissions**

Petitioner requests that Associate Justice Warren-McKinney answer in writing the following requests and that the subject matter of each request be deemed admitted unless, answered within 30 days after service of these requests and she serves upon the investigating committee a written answer or objection.

An answer to the Request for Admissions shall specifically admit or deny the matter set forth in detail the reasons why she cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that she qualify an answer, or deny only a part of the matter which is requested, she shall specify so much of it as is true and qualify or deny the remainder. She may not give lack of information or knowledge as a reason for failure to admit or deny unless she states that she has made reasonable inquiry and that the information known to or readily obtainable by her is insufficient to enable her to admit or deny. References to the Code of Judicial Conduct are made with respect to the Church of God in Christ. All references to Emmanuel are made with respect to Emmanuel Church of God in Christ, Wichita, Kansas.

Request No.1: Admit that Enoch Perry, III, was General Counsel for the Church of God in Christ, Inc. during your professional association with the Office of the General Counsel.

Answer:

Request No.2: Admit that Enoch Perry, III, was your supervisor during your professional association with the Office of the General Counsel.

Answer:

Request No.3: Admit that you attended a meeting on or about December 4, 2004, at St. Mark Church of God in Christ, in Wichita, Kansas.

Answer:

Request No.4: Admit that Enoch Perry, III, asked you to attend the meeting in Wichita, Kansas on or about December 4, 2004.

Answer:

Request No.5: Admit that Bishop J. C. Gilkey, Sr. asked you to attend the meeting on or about December 4, 2004 held at St. Mark Church of God in Christ, in Wichita, Kansas

Answer:

Request No.6: Admit that the Emmanuel transfer request was discussed in your presence at the December 4, 2004 meeting held at St. Mark Church of God in Christ, in Wichita, Kansas.

Answer:

Request No.7: Admit that you participated in the discussion.

Answer:

Request No.8: Admit that you appeared before and were questioned by the Judiciary Qualifications and Nominations Committee in 2006.

Answer:

Request No.9: Admit that while you were before the committee that you were questioned about your previous contacts and involvements.

Answer:

Request No.10: Admit that in 2006, you told member (s) of the Judiciary Qualifications and Nominations Committee, that you would recuse yourself in matters in which you had prior contact and involvement.

Answer:

Request No.11: Admit that you did not disqualify, recuse yourself when the Emmanuel transfer matter was appealed to the Judiciary Board.

Answer:

Request No.12: Admit that you were aware of the General Board's May 2008 denial of Emmanuel's transfer request.

Answer:

Request No.13: Admit that Canon 3, C, (1) (b) and (c) of the Code of Judicial Conduct imposed a duty upon you to disqualify, recuse yourself in the Emmanuel transfer matter.

Answer:

Request No.13: Admit that the Code of Judicial Conduct imposes a duty upon you to maintain and enforce the independence of the judiciary.

Answer:

Request No.14: Admit that the Code of Judicial Conduct imposes a duty upon you to avoid impropriety and the appearance of impropriety.

Answer:

Request No.15: Admit that you are required to comply with the Code of Judicial Conduct.

Answer:

Request No.16: Admit that you are not exempt from compliance with the Code of Judicial Conduct.

Answer:

Request No.17: Admit that you are licensed to practice law in the states of Indiana and Texas.

Answer:

Request No.18: Admit that you have read *Matthew 19:5-6*.

Answer:

Respectfully submitted,

---

Emmitt Taylor  
Petitioner  
P. O. Box 4622  
Wichita, Kansas 67204

**VERIFICATION**

STATE OF CALIFORNIA        )  
  )  
COUNTY OF \_\_\_\_\_ )        **ss:**

Barbara J. Warren-McKinney of lawful age, being first duly sworn on oath, states:

That she has read the foregoing **Request For Admissions** and that the statements therein contained are true and correct.

\_\_\_\_\_  
Barbara J. Warren-McKinney

**SUBSCRIBED AND SWORN OR AFFIRMED** to before me, a Notary Public,  
in and for the county and state aforesaid, this \_\_\_\_\_ day of \_\_\_\_\_, 2009.

My appointment expires:\_\_\_\_\_

(SEAL)

\_\_\_\_\_  
Notary Public (signature)

\_\_\_\_\_  
Notary Public (printed name)

**CHURCH OF GOD IN CHRIST, INC.  
GENERAL ASSEMBLY**

**IN RE: PETITION FOR IMPEACHMENT** )  
 )  
 )  
 **OF** )  
 )  
 )  
 **ASSOCIATE JUSTICE, JOSEPH D. CLEMMONS, SR.** )  
 **JUDICIARY BOARD, SECRETARY** )  
 )

---

*Filed Pursuant To Article VIII*

**PETITION FOR IMPEACHMENT**

Comes Now, Emmitt Taylor of Wichita, Kansas, a delegate in good standing in the Church of God in Christ, hereinafter referred to as Petitioner and files this **Petition For Impeachment**, against Associate Justice, Joseph D. Clemmons, Sr. for grievous constitutional violations committed by him personally and in his official capacity. Petitioner has just cause to believe that the Associate Justice has violated the following specific constitutional provisions **Code Of Judicial Conduct**, Canon (s) 1 and 2 (a). Petitioner files this petition pursuant to the *Constitution*, Article VIII, Judiciary Board, Term Of Office, paragraphs 3, B, 1 (a) & (b) which states the following:

(3) “A Judiciary Board member may be removed from office prior to the expiration of his term due to incapacitation, in competency (*sic*) or the commission of acts in violation of the Constitution of the Church of God in Christ”.

(B) “Procedure for filing and handling charges”.

(1) “A delegate in good standing of the Church of God in Christ having just cause to believe that a member of the Judiciary Board has committed an act repugnant to the Constitution of the Church of God in Christ may file a charge”.

(a) “The written petition shall be filed in the office of the secretary of the General Assembly specifically setting out the charges and things complained of; and

copies shall be filed with the secretary of the Judiciary Board.”

(b) “Every petition shall be signed by the individual making the charge, whose address shall also be stated. His signature constitutes a certificate by him that to the best of his knowledge, information and belief, there is good ground to support the charge.”

### I.

Associate Justice, Clemmons was elected to the Church of God in Christ, Judiciary Board by the General Assembly and currently resides in Connecticut. He is the secretary of the Judiciary Board.

### II.

The Judicial Code, the Code of Judicial Conduct is a mandated addendum or addition to the Church of God in Christ, *Constitution*.

“Article VIII, under subtitle, Organization And Procedure, provision three, mandates that it is the Judiciary Board who shall, with the approval of the General Assembly, prepare and keep in revision a Judicial Code which **shall be an addendum to the Constitution of the Church of God in Christ, . . .**” *An Introduction to Biblical Apologetics for the establishment of the Judiciary Board of the Church of God in Christ, A Judicial Code Is Mandated*, p. 1 (bold face added).

The Judicial Code, hereinafter referred to as the Code of Judicial Conduct was adopted in April 1993, and is comprised of canons (rules, standards) which the justices are to comply with and adhere to in carrying out and performing their judicial duties, responsibilities.

“All justices should comply with this Code . . . .” *Compliance With The Code Of Judicial Conduct. An Introduction to Biblical Apologetics for the establishment of the Judiciary Board.*

### III.

Further, pursuant to Canon 2, A Justice Clemmons had a duty to :

“ . . . respect and comply with the Church’s constitution, amendments, by-laws and all appendices . . . .” Code of Judicial Conduct, Canon 2, A.  
(See exhibit 1)

#### IV.

On or about November 28, 2004, Emmanuel Church of God in Christ, Wichita, Kansas, submitted a jurisdictional transfer request to the General Secretary and the respective jurisdictional bishops of Kansas Southwest and Kansas Central. By mediated agreement the transfer request was submitted to the Church of God in Christ, Inc. in March 2008 and was denied by the General Board in May 2008. Emmanuel appealed the transfer matter to the Judiciary Board in May 2008.

Emmanuel filed a brief before the Board and was subsequently notified by mail of the scheduled hearing for August 26, 2008, before the Board in Oakbrook, Illinois. The hearing was continued without prior notice to Emmanuel to September 23, 2008. Emmanuel’s representative found out about the continuance on August 25, 2008, while in the airport, just before boarding the plane enroute to Chicago and was by divine providence able to avoid a total loss of airfare. Typically, it is the secretary’s duty to send out the notice of continuance; however in this situation Secretary Clemmons failed to do so.

#### V.

On or about May 12, 2009, Secretary Clemmons, mailed an opinion dated January 22, 2009 along with a letter signed exclusively by him dated April 12, 2009. The majority opinion and letter purportedly affirmed the General Board’s denial of

signature that purports to be that of Bishop A. Ladell Thomas. Justice Thomas was not present in Oakbrook at the September 23, 2008 hearing; it is reported that he was not present in Memphis at the November 2008, Holy Convocation or at the leadership conference in Phoenix in January 2009 nor was he present at the April Call Meeting 2009.

It is widely reported that Associate Justice Thomas has Alzheimer's and is virtually restricted to his home; understandably his family desires to protect and care for him. It is widely known that Alzheimer's disease or a similar illness is characterized by premature senile mental deterioration; a justice afflicted with this disease is unable to perform his judicial duties.

“In all ecclesiastical judicial functions a justice should be professional, **competent**, prompt and diligent”. *An Introduction to Biblical Apologetics for the establishment of the Judiciary Board of the Church of God in Christ*. Preamble, Judicial Code of Conduct, Competence. (See exhibit 2) bold face added.

It is inconceivable and unconscionable that Secretary Clemmons would approve/sanction the signature of a colleague, unable to perform his judicial duties due to Alzheimer's or a related illness and that he would subsequently send out, publish a document bearing the colleague's signature and simultaneously violate the integrity of the Judiciary Board. Secretary Clemmons, knew Justice Thomas' signature was on the document. He knew that Justice Thomas had not attended the meetings and it is difficult to believe that he was unaware of his colleague's inability to perform his judicial duties.

Canon 1 of the Code of Judicial Conduct states:

**“A Justice Should Uphold The Integrity And Independence Of The**

**Judiciary.** An independent and honorable judiciary is indispensable to justice in the Church of God in Christ. A justice should participate in establishing, maintaining, and enforcing, and should himself/herself observe, high standards of conduct so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective”.

It erodes the judiciary’s integrity, when the secretary approves/sanctions and publishes an opinion bearing the signature of a colleague afflicted with Alzheimer’s or a related illness, a colleague that is unable to perform his judicial duties.

## VI.

On April 4, 1990, the Judiciary Board was established as an independent third branch of church government designed to exist in conjunction with the executive and legislative branches of government. Each judiciary board member is to observe the rules and ethics of the Board. Associate Justice Clemmons had a constitutional duty to maintain and enforce the integrity of the judiciary.

## VII.

Secretary Clemmons had a constitutional duty to avoid impropriety and the appearance of impropriety in all his activities. Canon 2, A, Code of Judicial Conduct states:

“ A justice should respect and comply with the Church’s constitution, amendments, by-laws, and all appendices thereto and should conduct himself/herself at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary”.

yet Secretary Clemmons failed to do so. Also, it is contrary to scripture to take advantage of a brother’s diminished capacity. Jesus says, in *Luke 6:31*

“And as ye would that men should do to you, do ye also to them likewise”.

few of us, if any, want to be taken advantage of and certainly not in a time of diminished capacity. Scripture also instructs in *Galatians 6:10*:

“As we have therefore opportunity, let us do good unto all *men*, especially unto them who are of the household of faith”.

Bishop A. Ladell Thomas, has faithfully ministered unto the Church for many years and should be given the opportunity to retire or gracefully resign, after his vote and signature in this appeal matter is withdrawn, since he was unable to sit and perform his judicial duties.

#### VIII.

Associate Justice, Clemmons knowingly approved/sanctioned, and published an opinion bearing the signature of a colleague unable to perform his judicial duties, due to the colleague's affliction, the disease of Alzheimer's or related illness; thereby compromising the integrity of the Judiciary Board, violating Canon (s) 1 and 2, A of the *Church of God in Christ, Constitution, Code of Judicial Conduct*.

**WHEREFORE**, Petitioner prays that Associate Justice Clemmons' activities and actions in the herein matter be investigated, that this matter be set for trial and that he be found guilty of the constitutional violations herein stated and impeached, removed from office.

Respectfully submitted,

---

Emmitt Taylor, Petitioner  
P. O. Box 4622  
Wichita, Kansas 67204

---

Doris J. Woods  
Church Secretary

---

Jerome Franklin

---

James S. Rich

---

Evelyn Echols

---

Lois McIntyre

---

Elder Ronald E. Stidham

**IN RE: PETITION FOR IMPEACHMENT** )  
**OF** )  
 )  
**ASSOCIATE JUSTICE, JOSEPH D. CLEMMONS, SR.** )  
**JUDICIARY BOARD, SECRETARY** )  
 )

---

**Request For Admissions**

Petitioner requests that Associate Justice Clemmons answer the following requests and that the subject matter of each request be deemed admitted unless, within 30 days after service of these requests, he serves upon the investigating committee a written answer or objection.

An answer to the Request for Admissions shall specifically admit or deny the matter or set forth in detail the reasons why he cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that he qualify an answer, or deny only a part of the matter of which the admission is requested, he shall specify so much of it as is true and qualify or deny the remainder. He may not give lack of information or knowledge as a reason for failure to admit or deny unless he states that he has made reasonable inquiry and that the information known to or readily obtainable by him is insufficient to enable him to admit or deny. References to the Code of Judicial Conduct are made with respect to the Church of God in Christ. All references to Emmanuel are made with respect to Emmanuel Church of God in Christ, Wichita, Kansas. All references to Justice Thomas are specifically made with respect to Associate Justice, Bishop A. Ladell Thomas.

Request No.1: Admit that you knew on September 23, 2008 that Justice Thomas did not attend the Judiciary Board hearing involving the Emmanuel transfer request in Oakbrook, Illinois.

Answer:

Request No.2: Admit that you knew prior to May 12, 2009 that Justice Thomas did not attend the November 2008 Holy Convocation.

Answer:

Request No.3: Admit that you knew on or about January 22, 2009 that Justice Thomas was not in attendance at the Leadership Conference in

Phoenix, Arizona.

Answer:

Request No.4: Admit that you knew on or before April 19, 2009 that Justice Thomas did not attend the April 2009 Call meeting in Memphis, Tennessee.

Answer:

Request No.5: Admit that you had been told or were aware prior to January 22, 2009 that Justice Thomas has Alzheimer's or a similarly related illness.

Answer:

Request No.6: Admit that you inquired before May 12, 2009 as to why Justice Thomas was absent during scheduled meetings.

Answer:

Request No.7: Admit that you, and the following Justices: Warren-McKinney, Perry, Hammonds and Slack signed the January 22, 2009 opinion in Phoenix, Arizona while attending the Leadership Conference.

Answer:

Request No.8: Admit that you sent the January 22, 2009 opinion to Justice Thomas by mail or otherwise.

Answer:

Request No.9: Admit that you solicited Justice Thomas' signature on the January 22, 2009 opinion.

Answer:

Request No.10: Admit that you knew prior to January 22, 2009 that Justice Thomas was unable to perform his judicial duties.

Answer:

Request No.11: Admit that you knew prior to January 22, 2009 that a justice in all ecclesiastical judicial functions must be competent.

Answer:

Request No.12: Admit that you sent the January 22, 2009 opinion bearing Justice Thomas' signature to Emmanuel Church of God in Christ, in care of Elder Ronald E. Stidham on May 12, 2009.

Answer:

Request No.13: Admit that the Code of Judicial Conduct, requires you to maintain and enforce the integrity of the judiciary.

Answer:

Request No.14: Admit that the Code of Judicial Conduct, requires you to avoid impropriety and the appearance of impropriety in all your activities/actions.

Answer:

Request No.15: Admit that you are required to comply with the Code of Judicial Conduct.

Answer:

Request No.16: Admit that you are not exempt from compliance with the Code of Judicial Conduct.



**IN RE: PETITION FOR IMPEACHMENT** )  
 )  
**OF** )  
 )  
**ASSOCIATE JUSTICE, BISHOP F. E. PERRY** )  
 )

*Filed Pursuant To Article VIII*

**PETITION FOR IMPEACHMENT**

Comes Now, Emmitt Taylor of Wichita, Kansas, a delegate in good standing in the Church of God in Christ, hereinafter referred to as Petitioner and files this **Petition For Impeachment**, against Associate Justice, Bishop F. E. Perry for grievous constitutional violations committed by him personally and in his official capacity.

Petitioner has just cause to believe that the Associate Justice has violated the following specific constitutional provisions **Code Of Judicial Conduct**, Canon (s) 2, A and B, and 3, C, 1, (a). Petitioner files this petition pursuant to the *Constitution*, Article VIII, Judiciary Board, Term Of Office, paragraphs 3, B, 1 (a) & (b) which states the following:

(3) “A Judiciary Board member may be removed from office prior to the expiration of his term due to incapacitation, in competency (*sic*) or the commission of acts in violation of the Constitution of the Church of God in Christ”.

(B) “Procedure for filing and handling charges”.

(1) “A delegate in good standing of the Church of God in Christ having just cause to believe that a member of the Judiciary Board has committed an act repugnant to the Constitution of the Church of God in Christ may file a charge”.

(a) “The written petition shall be filed in the office of the secretary of the General Assembly specifically setting out the charges and things complained of, and

copies shall be filed with the secretary of the Judiciary Board”.

(b) “Every petition shall be signed by the individual making the charge, whose address shall also be stated. His signature constitutes a certificate by him that to the best of his knowledge, information and belief, there is good ground to support the charge”.

### I.

Associate Justice, Perry was elected to the Church of God in Christ, Judiciary Board by the General Assembly and currently resides in Ohio.

### II.

The Judicial Code, the Code of Judicial Conduct is a mandated addendum or addition to the Church of God in Christ, *Constitution*.

“Article VIII, under subtitle, Organization And Procedure, provision three, mandates that it is the Judiciary Board who shall, with the approval of the General Assembly; prepare and keep in revision a Judicial Code which **shall be an addendum to the Constitution of the Church of God in Christ, . . . .**” *An Introduction to Biblical Apologetics for the establishment of the Judiciary Board of the Church of God in Christ, A Judicial Code Is Mandated*, p. 1 (bold face added).

The Judicial Code, hereinafter referred to as the Code of Judicial Conduct was adopted in April 1993, and is comprised of canons (rules, standards) which the justices are to comply with and adhere to in carrying out and performing their judicial duties, responsibilities.

“All justices should comply with this Code . . . .” *Compliance With The Code Of Judicial Conduct. An Introduction to Biblical Apologetics for the establishment of the Judiciary Board.*

### III.

Further, pursuant to Canon 2, A, Justice Perry had a duty to:

“ . . . respect and comply with the Church’s constitution, amendments, by-laws and appendices . . . .” Code of Judicial Conduct, Canon 2, A (See exhibit 1).

#### IV.

On or about November 28, 2004, Emmanuel Church of God in Christ, Wichita, Kansas, submitted a jurisdictional transfer request to the General Secretary and the respective jurisdictional bishops of Kansas Southwest and Kansas Central. By mediated agreement the transfer request was submitted to the Church of God in Christ, Inc., in March 2008 and was denied by the General Board in May 2008. Emmanuel appealed the transfer matter to the Judiciary Board in May 2008. Bishop Gilkey and Kansas Southwest opposed the transfer before the Judiciary Board.

#### V.

Associate Justice Perry and Bishop Joseph C. Gilkey, Sr., Jurisdictional Prelate of Kansas Southwest, Church of God in Christ, are close personal friends and have been friends for more than 24 years. Not only has Justice Perry been closely associated with Bishop Gilkey for over 24 years, he has supported and worked with Kansas Southwest Jurisdiction; for example he has attended as well as preached at its Holy Convocation on numerous occasions. In 1985, Bishop F. E. Perry ran a full page ad in the 18<sup>th</sup> Annual Holy Convocation, Church of God in Christ, Kansas Southwest, July 22-28, 1985 souvenir book. (See exhibit 2, front page of souvenir book). The full page ad reads:

**“Congratulations to My True and Dear Friend Bishop Joseph Cisro Gilkey, Sr. God Bless You”.**

“**Bishop F. E. Perry** Prelate: Ohio Southern Jurisdiction”. (See insert\*).

VI.

Bishop Gilkey is the presiding officer in Kansas Southwest, he controls, directs and executes his will in Kansas Southwest; he and Kansas Southwest are intricately woven together as one. He was a party in the proceeding before the Judiciary Board. Justice Perry’s ability to perform and execute his judicial duties impartially and without taint was severely compromised due to his 24 year close friendship with Bishop Gilkey. Justice Perry’s impartiality is and was reasonably questioned in the Emmanuel transfer matter. It is not difficult for reasonable minds to perceive, that a close friend of 24 years, easily brings to the proceeding an inclination to prejudge the proceeding in favor of the close friend; and simultaneously prejudice those who adhere to the opposing view.

VII.

Canon 3, *Church of God in Christ, Constitution*, Code of Judicial Conduct states:

**“A Justice Should Perform The Duties Of His/Her Office Impartially And Diligently”.**

yet Associate Justice Perry failed to do so. Canon 3, further states:

“The judicial duties of a justice take precedence over all his/her other activities as pastor, district superintendent, district missionary, state supervisor, jurisdictional bishop, and national officers. His/her judicial duties include all the duties of his/her office prescribed by the constitution. In the performance of these duties, the following standards apply:”

Canon 3, C, (1) (a) states:

“ A justice should disqualify himself/herself in a proceeding in which his/her impartiality might reasonably be questioned, including but not limited to instances

where: (a) he/she has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding". (See exhibits 3 and 4).

Justice Perry, brought to the Emmanuel transfer proceeding 24 years of partiality toward his true and dear friend and still failed to disqualify himself.

#### VIII.

In March 2009, it was unclear to the local church Emmanuel, why Justice Perry had failed to disqualify himself and comply with the *Constitution*; so the local church on or about March 18, 2009, filed its **Motion To Disqualify Specified Associate Justices**, (See exhibit 5). He received the motion on or about March 25, 2009 (See exhibit 6, U. S. Postal, proof of delivery green card); however he continued to defy and or ignore the *Constitution*, as well as the motion.

On May 12, 2009, the Judiciary Board published an opinion dated January 22, 2009, signed by Justice Perry denying the transfer. Perhaps Justice Perry, a jurisdictional bishop chose to continue to ignore his constitutional duty to disqualify himself, because he had voted and signed the January 22<sup>nd</sup> opinion; however such an argument is without merit since a justice can withdraw his vote and abstain prior to publication of a decision. Justice Perry, should have and could have demonstrated respect for the *Constitution* and complied with it, any time prior to the May 12, 2009 publication; however he failed to do so.

#### IX.

Justice Perry, is and was constitutionally required to avoid impropriety and the

requirement that:

**“A Justice Should Avoid Impropriety And The Appearance Of Impropriety In All His/Her Activities.** A . A justice should respect and comply with the Church’s constitution, amendments, by-laws, and all appendices thereto and should conduct himself/herself at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. B. A justice should not allow his/her family, social, or other relationships to influence his/her judicial conduct or judgment. He/she should not lend the prestige of his/her office to advance the private interests of others; nor should he/she convey or knowingly permit others to convey the impression that they are in a special position to influence him/her”.

Justice Perry, lightly esteemed the above constitutional amendment. He was to conduct himself at all times in a manner that promotes public confidence in the impartiality of the judiciary; however he sat as judge in a matter of great importance to his buddy of 24 years, a man he himself describes as his “true and dear friend”.

His social relationship (s) cannot be permitted to influence his judicial judgment. He was to avoid the appearance of allowing his social relationship to influence his judicial judgment. He was to avoid lending the prestige of his office to advance the private interests of others and the very appearance of lending the prestige of his office to advance the private interest of his buddy. He was to avoid the appearance of conveying to others that Bishop Gilkey was in a special position to influence him; yet Justice Perry failed to do so. *1 Thessalonians 5:22* instructs us to:

“Abstain from all appearance of evil”

X.

Canon 3, which states:

**“A Justice Should Perform The Duties Of His/Her Office Impartially And Diligently”.**

embodies at its very core *Deuteronomy 1:16, Proverbs 28:21, James 2:1 & 9* which states:

“Ye shall not respect persons in judgment . . . .”

“To have respect of persons is not good . . . .”

“My brethren have not the faith of our Lord Jesus Christ, the Lord of glory, with respect of persons”.

“But if ye have respect to persons, ye commit sin, and are convinced of the law as transgressors”.

Justice Perry, must not be allowed to enshrine respect of persons.

## XI.

Justice Perry, knew of his close personal friendship with Bishop Gilkey; he publicly proclaimed their friendship and describes Bishop Gilkey as his “true and dear friend. He knew that his friend was opposing the Emmanuel transfer and knew or should have known of his own inclination to prejudge or judge the transfer matter in a manner that would advance the interest of his friend. He defied and ignored the Code of Judicial Conduct which required him to disqualify himself and continued to ignore the constitutional amendment even after the local church Emmanuel filed its motion to disqualify him.

**WHEREFORE,** Petitioner prays that Associate Justice Perry’s activities and actions in the herein matter be investigated, that this matter be set for trial, and that he be

found guilty of the constitutional violations herein stated and impeached, removed from

office.

Respectfully submitted,

---

Emmitt Taylor  
Petitioner  
P. O. Box 4622  
Wichita, Kansas 67204

Emmanuel Church of God in Christ, Wichita, Kansas

---

Doris J. Woods  
Church Secretary

---

Lois McIntyre

---

Evelyn Echols

---

James S. Rich

---

Jerome Franklin

---

Elder Ronald E. Stidham



Request No.3: Admit that an ad was run in the 18<sup>th</sup> Annual Holy Convocation, Church of God in Christ, Kansas Southwest Jurisdiction, July 22-28, 1985 souvenir book, featuring you congratulating Bishop Gilkey.

Answer:

Request No.4: Admit that you have supported and worked with Kansas Southwest Jurisdiction since 1985.

Answer:

Request No.5: Admit that you had conversations (private or otherwise) with Bishop Gilkey concerning the Emmanuel transfer in 2004.

Answer:

Request No.6: Admit that you had conversations (private or otherwise) with Bishop Gilkey concerning the Emmanuel transfer in 2008.

Answer:

Request No.7: Admit that you discussed the Emmanuel transfer matter with Bishop Gilkey on or about September 22, 2008 in Oakbrook, Illinois prior to the scheduled September 23, 2008 Judiciary Board hearing.

Answer:

Request No.8: Admit that you had conversations (private or otherwise) with Bishop Gilkey concerning the Emmanuel transfer between October 2008 and January 22, 2009.

Answer:

Request No.9: Admit that you attended the Leadership Conference held in Phoenix, Arizona in January 2009.

Answer:

Request No.10: Admit that you were asked by your friend to sway the Judiciary Board members to vote against the transfer.

Answer:

Request No.11: Admit that you were expected by those in opposition to the transfer to sway the Board members to vote against the transfer.

Answer:

Request No.12: Admit that you orchestrated an opportunity for Bishop Gilkey and or his representative to address certain members of the Judiciary Board, during the January 2009 Leadership Conference in Phoenix, Arizona.

Answer:

Request No.13: Admit that you assisted in the orchestration of the opportunity for Bishop Gilkey and or his representative to address certain members of the judiciary, during the January 2009, Leadership Conference in Phoenix, Arizona.

Answer:

Request No.14: Admit that you leaked information regarding the Emmanuel transfer to Bishop Gilkey or his representative on or about January 22, 2009.

Answer:

Request No.15: Admit that you did not disqualify yourself in the Emmanuel transfer matter before the Judiciary Board.

Answer:

Request No.16: Admit that the Code of Judicial Conduct imposed a duty upon you to disqualify yourself in the Emmanuel transfer matter.

Answer:

Request No.17: Admit that the Code of Judicial Conduct imposes a duty upon you to avoid impropriety and the appearance of impropriety.

Answer:

Request No.18: Admit that you are required to comply with the Code of Judicial Conduct.

Answer:

Request No.19: Admit that you are not exempt from compliance with the Code of Judicial Conduct.

Answer:

Request No.20: Admit that you have read *Deuteronomy 1:16, Proverbs 28:21,* and *James 2:1 & 9.*

Answer:

Respectfully submitted,

\_\_\_\_\_  
Emmitt Taylor  
Petitioner  
P. O. Box 4622  
Wichita, Kansas 67204

**VERIFICATION**

**STATE OF OHIO**            )  
  )  
**COUNTY OF** \_\_\_\_\_)

**ss:**

F. E. Perry, of lawful age, being first duly sworn on oath, states:

That he has read the foregoing **Request For Admissions** and that the statements therein contained are true and correct.

\_\_\_\_\_  
F. E. Perry

**SUBSCRIBED AND SWORN OR AFFIRMED** before me, a Notary Public, in and for the county and state aforesaid, this \_\_\_\_\_ day of \_\_\_\_\_ 2009.

My appointment expires:\_\_\_\_\_

(SEAL)

\_\_\_\_\_  
Notary Public (signature)

\_\_\_\_\_  
Notary Public (printed name)

Request For Admissions  
Page 5 of 5

**Emmitt Taylor**

P. O. Box 4622  
Wichita, Kansas 67204

October 8, 2009

Bishop J. H. Lyles, General Assembly Secretary      C.M.R.R.R  
Church of God in Christ, Inc.                              7008 1830 0001 9108 8796  
930 Mason Street  
Memphis, Tennessee 38126

Re:    Petition (s) For Impeachment of the following Judiciary Board members:  
       Justices Clemmons, Warren-McKinney and Perry

Dear Bishop Lyles:

Enclosed you shall find an original Petition For Impeachment for the above named justices along with Request For Admissions. The petitions are being filed pursuant to the *Constitution*, Article VIII, Judiciary Board, Term Of Office, paragraphs 3, B, 1 (a) and (b). It is my hope that the Request For Admissions, will aid the investigating committee in its investigation of these matters.

Copies of the enclosed are also being mailed to the Judiciary Board Secretary.

Sincerely,

Emmitt Taylor

Enclosures (6)

cc:

Joseph D. Clemmons, Sr., Judiciary Board Secretary  
C.M.R.R.R. #7008 0150 0001 7378 8694

Bishop Samuel P. Nesbitt, Chief Justice  
C.M.R.R.R. #7008 0150 0001 7378 8700

file

**Emmitt Taylor**

P. O. Box 4622  
Wichita, Kansas 67204

October 27, 2009

Associate Justice, Bishop F. E. Perry  
Church of God in Christ, Inc.  
Judiciary Board  
3716 Rolliston Road  
Shaker Heights, Ohio 44120

C.M.R.R.R.  
7008 0150 0001 7378 8717

Re: In Re: Petition For Impeachment of Associate Justice, Bishop F. E. Perry

Dear Bishop Perry:

Enclosed you shall find a copy of the following; the **Petition For Impeachment** and **Request For Admissions**. The pleadings were filed with the Secretary of the General Assembly on or about October 15, 2009 and copies were also filed with the Secretary of the Judiciary Board on or about October 17, 2009.

Sincerely,

Emmitt Taylor

Enclosures (2)

cc:

file

**Emmitt Taylor**

P. O. Box 4622  
Wichita, Kansas 67204

October 27, 2009

Associate Justice, Barbara J. Warren-McKinney  
Church of God in Christ, Inc.  
Judiciary Board  
5825 Imperial Avenue  
San Diego, California 92114

C.M.R.R.R.  
#7008 0150 0001 7378 8724

Re: In Re: Petition For Impeachment of Associate Justice, Barbara J. Warren-McKinney

Dear Justice Warren-McKinney:

Enclosed you shall find a copy of the following; the **Petition For Impeachment and Request For Admissions**. The pleadings were filed with the Secretary of the General Assembly on or about October 15, 2009 and copies were filed with the Secretary of the Judiciary Board on or about October 17, 2009.

Sincerely,

Emmitt Taylor

Enclosures (2)

cc:

file