

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Dr. Aaron Bishop, Dr. Jennifer Bishop Greater
Columbia Community Development
Corporation and Grace Christian Church

Plaintiffs,

vs.

Angela Bishop Hammonds, Robin McRae, and
Roderick Bishop

Defendants.

IN THE COURT OF COMMON PLEAS

OF THE FIFTH JUDICIAL CIRCUIT

C.A. No.

SUMMONS

TO: DEFENDANTS NAMED ABOVE:

YOU ARE HEREBY summoned and required to answer the Complaint in this action of which a copy is herewith served upon you, and to serve a copy of your Answer upon the subscriber at 685 Highway 15 South, St. George, South Carolina 29477, within 30 days, and if you fail to answer or appear and defend the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in this Complaint.

THE SINGLETARY GROUP, LLC

By: s/Reagan Singletary
Reagan Singletary (SC Bar #77541)
685 Highway 15 South
St. George, South Carolina 29477
Telephone: 803-552-6957
Facsimile: 803-753-9623
reagan@thesingletarygroup.com
Attorney for Plaintiffs

November 13, 2023
Columbia, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Dr. Aaron Bishop, Dr. Jennifer Bishop,
Greater Columbia Community Development
Corporation, and Grace Christian Church

Plaintiffs,

vs.

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C.A. No.

**COMPLAINT FOR DECLARATORY
JUDGMENT AND INJUNCTIVE RELIEF
(NON-JURY)**

Plaintiffs, Dr. Aaron Bishop (“Pastor Bishop”), Dr. Jennifer Bishop (“Co-Pastor Bishop”), Greater Columbia Community Development Corporation, Inc. (the “Corporation”) and Grace Christian Church (the “Church”) (hereinafter collectively referred to as “Plaintiffs”) complaining of Defendants Angela Bishop Hammonds (“Defendant Hammonds”), Robin McRae (“Defendant McRae”), and Roderick Bishop (“Defendant Roderick”), and (hereinafter collectively referred “Defendants”) alleges as follows:

PARTIES AND JURISDICTION

1. Pastor Bishop and Co-Pastor Bishop are residents of Richland County, State of South Carolina.
2. Grace Christian Ministries, Inc. d/b/a the Corporation, is a nonprofit corporation organized and incorporated in the State of South Carolina.
3. The Church is a religious place of worship located in Richland County, State of South Carolina, and controlled by the Corporation.

4. Defendant Hammonds, Defendant McRae, and Defendant Roderick are individual members of the Church, serving with Pastor Bishop and Co-Pastor Bishop on the Board of Advisors of the Corporation.

5. The acts or omissions giving rise to this action occurred in Richland County, State of South Carolina; thus, venue is proper in Richland County.

6. The parties hereto and subject matter hereof, all things and matters hereinafter alleged, are within the jurisdiction and purview of this Honorable Court.

FACTUAL BACKGROUND

7. As a non-profit organization, the Corporation operates in accordance with the South Carolina Nonprofit Corporation Act (S.C. Code Ann. 33-31-705, *et seq.*).

8. The Corporation historically operates in accordance with its Bylaws, which govern the Corporation and have been in use since on or about March, 1995, attached hereto as Exhibit “A” and incorporated herein by reference (“Corporation Bylaws”).

9. The Corporation and the Church are both currently led by Pastor Bishop, appointed permanently by Corporation Bylaws.

10. Pastor Bishop has held the position of pastor in the Church for 15 years prior to taking his sabbatical, as further detailed below.

11. Pastor Bishop also serves as the Chairman of the Board of Advisors a/k/a Board of Trustees (hereinafter “the Board”) and is deemed a member of the Corporation and the Church by the Corporation Bylaws.

12. As a non-profit corporation, the Corporation is required to provide notice to its members in a fair and reasonable manner, pursuant to S.C. Code Ann. § 33-31-705(a).

13. On or about March 25, 2022, Pastor Bishop sent a letter notifying Defendant Hammonds, Defendant McRae, and Defendant Roderick, along with the other members of the Church, that he would take a six-month sabbatical from his pastoral duties, which was originally scheduled to begin on March 27, 2022, and end on October 1, 2022, attached hereto as Exhibit “B” and incorporated herein by reference (“Sabbatical Request Letter”).

14. In said Sabbatical Request Letter, Pastor Bishop stated that during his sabbatical there should be no significant operational changes or administrative dismissals within the Church, and no reconfiguration of the Church’s organizational chart.

15. On or about March 27, 2022, Pastor Bishop began his sabbatical from his pastoral duties.

16. On or about May 31, 2022, Sean Dreher was appointed by the Church’s Committee and Administrative Team, with the guidance of Pastor Bishop, to serve as Interim Pastor of the Church during Pastor Bishop’s sabbatical.

17. On or about July 20, 2022, Sean Dreher sent a letter of resignation to Pastor Bishop and the other leaders of the Church stating that he would resign from his duties as Interim Pastor of the Church effective August 1, 2022, attached hereto as Exhibit “C” and incorporated herein by reference (“Interim Pastor Resignation Letter”).

18. On or about October 20, 2022, the Church’s Administrative Team, Clergy Team, and Church Members sent a letter to Pastor Bishop unilaterally extending his sabbatical until January 1, 2024, attached hereto as Exhibit “D” and incorporated herein by reference (“Sabbatical Extension Letter”).

19. Pastor Bishop never responded to said Sabbatical Extension Letter and was not required to do so.

20. As the Church is under the control of the Corporation, members of the Church have a right to receive notice of every meeting called within the Church pertaining to Church matters.

21. As stated above, Pastor Bishop is a member of the Church and, as such, reserves the right to have notice of every meeting called within the Church pertaining to Church matters.

22. Article 3 of the Corporation Bylaws states that all meetings are to be announced three (3) consecutive Sundays from the Pulpit by the Pastor of the Church.

23. Article 3 of the Corporation Bylaws states that any emergency meeting can only be called by the Pastor of the Church.

24. On or about October 1, 2023, Defendants held a “Special Church Meeting”, without giving prior notice to Pastor Bishop as required by his membership with the Corporation and Church, as well as his status as pastor of the Church, to remove Pastor Bishop from his position as pastor of the Church, attached hereto as Exhibit “E” and incorporated herein by reference (“October 1, 2023, Meeting Minutes”).

25. As Pastor Bishop received no prior notice of said October 1, 2023, “Special Church Meeting,” Pastor Bishop did not attend said “Special Church Meeting” and was not involved in calling or taking any action at said meeting.

26. At some point after July 20, 2022, and before October 15, 2023, Sean Dreher resumed his position as Interim Pastor of the Church without the approval of Pastor Bishop.

27. On or about October 15, 2023, Pastor Bishop sent a letter to Sean Dreher notifying Sean Dreher of the end of Pastor Bishop’s sabbatical, effective October 9, 2023, and the end of Sean Dreher’s tenure as Interim Pastor, effective October 15, 2023, attached hereto as Exhibit “F” and incorporated herein by reference (“Sabbatical Conclusion Letter”).

28. When Pastor Bishop returned from his Sabbatical he appointed Dr. Jennifer Bishop as Co-Pastor of the Church on or about October 22, 2023. Under the Corporation bylaws, no Board vote was required for the appointment.

29. On or about October 24, 2023, Pastor Bishop appointed seven (7) additional Board members to the Board as Article 3 of the Corporation bylaws requires the Board to have twelve (12) members. Those new members include: Gene Sessions, Latasha Saunders, LaToya Quick, Will Horne, John Georgia, James Quick, and Nikki Georgia. Under the Corporation bylaws, no Board action was required for the appointment.

30. On or about October 24, 2023, Defendant Hammonds, Defendant McRae, and Defendant Roderick, sent a cease-and-desist letter to Pastor Bishop alleging that Pastor Bishop posted a flyer on or about October 18, 2023, conveying to the public that he would be preaching at the Church on October 22, 2023, attached hereto as Exhibit "G" and incorporated herein by reference ("Cease-and-Desist Letter").

31. Included along with the Cease-and-Desist Letter was a Board meeting notice regarding a Corporation "Special Meeting" scheduled for November 1, 2023, to vote on Pastor Bishop and "his ability to continue to effectively serve as Pastor of Grace Christian Church" and that the meeting "shall decide if [Pastor] Bishop will continue to serve as Pastor of Grace Christian Church," which was signed Defendant Hammonds, Defendant McRae, and Defendant Roderick.

32. On or about November 1, 2023, members of the Board, during an unduly called meeting, voted to remove Pastor Bishop as Pastor of Grace Christian Church. The meeting was not called by Pastor Bishop, nor was it announced for three (3) consecutive Sundays from the pulpit by the pastor of the church as governed by the bylaws. Upon information and belief, only three Board members were present for the meeting: Defendant Hammond, Defendant McRae, and Defendant

Roderick. Pastor Aaron Bishop and Co-Pastor Jennifer Bishop were notified prior to the meeting but did not attend. However, the seven (7) additional Board members were not provided with any prior notice as required under the Corporation bylaws nor were they involved in the action to remove Pastor Bishop from his pastoral duties.

33. On November 8, 2023, an Emergency Meeting was called by Pastor Bishop. All twelve (12) Board members were notified prior to the meeting, and all twelve (12) Board members attended the meeting, attached hereto as Exhibit “H” and incorporated herein by reference (“November 8, 2023 Board Meeting Minutes”).

34. During the November 8, 2023, meeting the Board voted to continue its support of Pastor Bishop to lead its ministry and the business of Grace Christian Church.

35. The Board also voted to rescind the November 1, 2023, cease and desist letter, allowing Pastor Bishop to release publications and general board announcements on any social media platform associated with Grace Christian Church and Grace Christian Ministries, Inc. d/b/a as Greater Columbia Community Development indefinitely.

36. Further, the Board voted that all persons who are on any account or in possession of any financial data related to Grace Christian Church, Greater Columbia Community Development Corporation, or any other entity associated with Grace Christian Church, provide all financial data in their possession, including bank statements, account numbers, financial institutions of the account, accountings, and filing summaries to Dr. Jennifer D. Bishop and Dr. Aaron Bishop, and add Dr. Aaron Bishop and Dr. Jennifer D. Bishop to those accounts, including but not limited to, all CashApp (Grace Christian Church of South Carolina and Radical Deeds) and other financial accounts, on or before Friday, November 17, 2023.

37. Since the Board's November 7, 2023 meeting, a Notice of Termination of Pastoral Duties has been issued to Pastor Bishop, upon information and belief, by the three (3) members of the Board who held the unduly called and invalid meeting on November 1, 2023. In the Notice of Termination, the three (3) Board members asked that that Pastor Bishop and Co-Pastor Bishop refrain from: (a) referencing themselves as Pastor and/or Co-Pastor of Greater Columbia Community Development Corporation and of Grace Christian Church of South Carolina; (b) entering the sanctuary without prior approval from the Board; and (c) threatening, harassing, and/or intimidating in any way members of the Corporation and members of the Church, attached hereto as Exhibit "I" and incorporated herein by reference ("Notice of Termination Letter").

FOR A FIRST CAUSE OF ACTION

(Declaratory Judgment)

38. Plaintiff hereby realleges and incorporates by reference the allegations contained in the foregoing paragraphs as though fully set forth verbatim herein.

39. As a non-profit organization, the Corporation operates in accordance with the South Carolina Nonprofit Corporation Act (S.C. Code Ann. 33-31-705, *et seq.*).

40. As a non-profit corporation, the Corporation is required to provide notice to its members in a fair and reasonable manner, pursuant to S.C. Code Ann. § 33-31-705(a).

41. Members of the Church have a right to receive notice of every meeting called within the Church pertaining to Church matters.

42. As stated above, Pastor Bishop is a member and the pastor of the Church and, as such, reserves the right to have notice of every meeting called within the Church pertaining to Church matters.

43. Pursuant to Article 3 of the Corporation Bylaws, all meetings are to be announced three (3) consecutive Sundays from the Pulpit by the pastor of the Church.

44. Pursuant to Article 3 of the Corporation Bylaws, any emergency meeting can only be called by the pastor of the Church.

45. Defendants rely upon a set of Bylaws not recognized by the Corporation.

46. Such Bylaws were improperly implemented at some time during Pastor Bishop's sabbatical, in violation of the Corporation Bylaws, in an attempt to advantage Defendants and disadvantage Plaintiff.

47. As a result of the foregoing, Plaintiffs are informed and believe that Pastor Bishop is entitled to an Order of this Court declaring the Corporation Bylaws with authority over this matter.

FOR A SECOND CAUSE OF ACTION

(Preliminary Injunction)

48. Plaintiff hereby realleges and incorporates by reference the allegations contained in the foregoing paragraphs as though fully set forth verbatim herein.

49. As a non-profit organization, the Corporation operates in accordance with the South Carolina Nonprofit Corporation Act (S.C. Code Ann. 33-31-705, *et seq.*).

50. As a non-profit corporation, the Corporation is required to provide notice to its members in a fair and reasonable manner, pursuant to S.C. Code Ann. § 33-31-705(a).

51. Members of the Church have a right to receive notice of every meeting called within the Church pertaining to Church matters.

52. As stated above, Plaintiff is a member and the pastor of the Church and, as such, reserves the right to have notice of every meeting called within the Church pertaining to Church matters.

53. Pursuant to Article 3 of the Corporation Bylaws, all meetings are to be announced three (3) consecutive Sundays from the Pulpit by the pastor of the Church.

54. Pursuant to Article 3 of the Corporation Bylaws, any emergency meeting can only be called by the pastor of the Church.

55. On or about October 1, 2023, Defendant Hammonds, Defendant McRae, and Defendant Roderick, led and/or held a “Special Church Meeting,” without giving prior notice to Pastor Bishop, as required by his membership with the Church and status as pastor of the Church, to remove Pastor Bishop from his position as pastor of the Church.

56. As Pastor Bishop received no prior notice of said October 1, 2023, “Special Church Meeting,” Pastor Bishop did not attend said “Special Church Meeting” and was not involved in calling or taking any action at said meeting.

57. Without such prior notice given to Pastor Bishop, said October 1, 2023, “Special Church Meeting” was unduly called and any action taken at said meeting was invalid and void.

58. On October 4, 2023, the Board advised Pastor Bishop of the church members’ request that he resign as Pastor of Grace Christian Church. No motions to remove Pastor Bishop were taken at that time.

59. Further, the Board called an invalid meeting on November 1, 2023, and voted to remove Pastor Bishop as Pastor of Grace Christian Church. This meeting was also unduly called and any action taken at said meeting was invalid and void.

60. Upon information and belief, no action was ever taken during a duly called meeting to remove Co-Pastor Bishop as Co-Pastor of Grace Christian Church, yet, there was also a decision to remove Co-Pastor Jennifer Bishop from her position effective November 1, 2023.

61. Due to Defendants' invalid and void action taken at said November 1, 2023, "Special Meeting," Plaintiffs will suffer irreparable harm and loss if Defendants are permitted to continue to act without accordance with the Corporation Bylaws.

62. The harm and loss are to Plaintiffs and Pastor Bishop's reputation and standing within the faith community in Richland County in general.

63. An injunction is necessary in this matter because the Plaintiffs' harm is continuing each day that Defendants continue to rely upon said invalid and void action taken at said November 1, 2023, "Special Meeting."

64. A temporary injunction is necessary in this action to protect the Plaintiffs and Pastor Bishop from the harm being inflicted on a continuous basis.

65. A temporary injunction is necessary in this action to protect the legal rights of the Plaintiffs and Pastor Bishop, and the Plaintiffs are entitled to this injunction.

66. Greater injury will be inflicted upon the Plaintiffs by the denial of temporary injunctive relief than would be inflicted upon Defendants by granting such relief.

67. Pursuant to Rule 65(a) of the South Carolina Rules of Civil Procedure, the Plaintiffs seek that this Court grant an injunction against Defendants requiring Defendants to cease and desist:

- a. Denying the Plaintiffs access to any other set of Bylaws that Defendants and Defendants' counsel are relying upon in making their claims;
- b. Denying the Plaintiffs access to relevant financial records belonging to accounts owned by or operated under the guise of the Church and the Corporation; and
- c. Attempting to remove Pastor Bishop from the position as pastor of the Church.
- d. Attempting to remove Co-Pastor Jennifer Bishop from her position as Co-Pastor of the Church.

WHEREFORE, Plaintiffs respectfully pray this Court:

- a. Declare that the termination of Pastor Bishop was not in accordance with the Defendants' authority and not in accordance with the Corporation Bylaws.
- b. Issue a temporary restraining order or preliminary injunction, ordering an immediate hearing on the temporary relief requested and restraining Defendants from: denying Plaintiffs access to any other set of Bylaws that Defendants and Defendants' counsel are relying upon in making their claims; denying the Plaintiffs access to relevant financial records belonging to accounts owned by the Church or operated on behalf of the Church during the timeframe of Pastor Bishop's sabbatical or thereafter, and the Corporation; and attempting to remove Pastor Aaron Bishop and Co-Pastor Jennifer Bishop from their positions as pastor and co-pastor of the Church without adherence to the Corporation Bylaws.
- c. Order Defendants to pay all costs and attorneys' fees associated with this action.
- d. Order such other and further relief as this Court deems just and proper.

Respectfully submitted,

THE SINGLETARY GROUP, LLC

By: s/Reagan Singletary

Reagan Singletary (SC Bar # 77541)
685 Highway 15 South
St. George, South Carolina 29477
Telephone: 803-552-6957
Facsimile: 803-753-9623
reagan@thesingletarygroup.com

Attorney for Plaintiffs

November 13, 2023
Columbia, South Carolina

EXHIBIT A
(Corporation Bylaws)

Constitution And By-Laws

Article 1 – Name

The Name of the body shall be called Grace Christian Ministries Incorporated. Being of God knowledgeable of the Grace of Almighty God and his abundant blessings and divine mercy as humble servants of the word, we do hereby proclaim Christ as our Savior through his plan of redemption for all mankind. We present ourselves as keeper and stewards of the master's plan for salvation, when He comes back to take us home with Him.

Article 2 – Purpose

Grace Christian Ministries was founded under the premises that God has called each of us according to His purpose. For by Grace ye are saved through faith and that not of yourselves. It is the gift of God, not of works, lest anyone should boast. Ephesians 2: 8, 9. II Timothy 1:9.

Article 3 – Grace Consideration For Operation

The ministry shall be operated by a General Board of Advisors to be known as the BOA consisting of 12 members as the 12 apostles of Jesus Christ, in accordance with the standards set in Titus 1: 5 –16.

These persons shall meet regularly to oversee and transact the business of the body. The Chairperson of the Board shall be the Pastor of Grace Christian Church and shall call meetings. All meeting will be announced three consecutive Sunday from the Pulpit by the Pastor of the church. An emergency meeting can only be called by the Pastor of the church.

If at any time during the meeting such strong discord or disagreement should arise all meetings are to be promptly adjourned.

All things must be done in accordance with the teaching of Jesus Christ. The General Board of Advisors shall be responsible for the information flow to all departments of the Church.

Articles 4 – Membership

The principle terms of membership are the conditions of salvation as expressed in Romans 10:9, 10. "That if thou shalt confess with thy mouth the Lord Jesus and shalt believe in thine heart that God hath raised Him from the dead, thou shalt be saved. For with the heart man believeth unto righteousness; and with the mouth confession is made unto salvation."

Those entering into the fellowship of this ministry shall conform their lives and faith to the teaching of the body of Jesus Christ.

Membership may be terminated by resignation or expulsion for cause or extended negligence in Christian duties and unexcused absences from worship service as based on Hebrew 10:25. "Not forsaking the assembling of ourselves together as the manner of some is, but exhorting one another, and so much the more, as ye see the day approaching."

Article 5 – Order of Ministry and Ordination

The order of the ministry shall be Pastor, Assistant Pastor, Licensed and Ordained Ministers and Ministers of Ordination examination. Upon recommendation of the Pastor, he (she) may be ordained.

Article 6 – Officers

All general officers will be elected by a majority of the congregation. Such officers may be terminated by the Board of Advisors, and will assume duties of that office at the close of the meeting, under the following provisions.

No member shall be eligible for election to office who has not been a member of Grace Christian Church for at least one year, unless appointed by the Pastor. His or her tenure of office shall be for a period of one, two or three years. Provided that the officer serves satisfactory they shall be eligible for re-election as often as desired by the majority vote for the members at the General Meeting. Should an office become vacant before elections are held, the pastor shall appoint a member to the office until the next general meeting when the vacancy can be filled.

The congregation will not vote on the Pastor, Asst. Pastor, Minister of Education, Minister of Music, Superintendent of Church School and Administrative Assistant. All of the above positions will be appointed by the Pastor.

Article 7 – Duties of Officers

Section 1 – The Pastor

The Pastor fills the first office in the local church both with dignity and usefulness. He is also appointed by Jesus Christ, his tenure will be permanent. He is to remain faithful and loyal to Grace, and endeavor to wholeheartedly support and defend the same.

The duties of the Pastor of Grace Christian Church are many. As stated in John 21:15. “Yes Lord thou knowest that I love thee. He saith unto him feed my sheep V-16 and again in V-17 Feed my sheep.”

Other duties:

1. To serve the community and the church
2. Visit the sick and shut-in
3. Perform marriages of the members of Grace Christian Church
4. Performs funerals and final rites.
5. Home visitations, teaching, retreat new members, conferences and etc.
6. The pastor is the chairman of all boards.
7. As a pastor he feeds his congregation spiritual food.
8. Serve Communion.

All of these duties are to be performed without charge. Compensation for these duties are included in the Pastor's salary, in accordance with the scripture. Read Malachi 3:10 and II Timothy 3:17-19. Duties performed for non-members should be paid by the parties. The pastor is to receive an annual 7% cost of living raise.

Section 2 – The Deacon

If you read Acts 6:1 – 8 you will understand that deacons are to be helps and counselors and fellow workers with the pastor. Some of the duties for the Deacon are the care of the poor and sick of the church, serving as the Pastor's Advisory Council and leading in the spiritual concern of the church. To the church and pastor in the selection of deacons see the Star Book of Ministries; Page 41 The Pastor and the Deacons Vol.1

Acts 6: 1- 7 6:1 “And in those days, when the numbers of disciples was multiplied there arose a murmuring of the Grecians against the Hebrews, because their windows, were neglected in the daily administration.” 6:2 “Then the twelve called the multitude of the disciples unto them, and said, is not fitting word of God, and serve tables.” 6:3 “Wherefore, brethren look among you for seven men of nonest report, full of spirit and wisdom. Whom we may appoint over this business.” 6:4 “But we will give ourselves continually to prayer, and to the ministry of the word.” (Also read V. 5 – 8)

I Timothy 3:8 – 13 “Likewise must the deacons be grace, not doubled tongued, not given to much wine, not greedy of filthy lucre; holding the mystery of the faith in pure conscience. And let these also fist be proved; let them in use the office of a deacon, being found blameless. Even so must their wives be grace, not slanders, sober, faithful in all things. Let the deacons be the husbands of one wife, ruling their children and their own house well. For they that have used the office as a deacon will purchase to themselves a good degree, and great boldness in the faith which is in Christ Jesus”

Section 3 – The Trustee

The pastor is intimately related to all departments of the church's life and work. He is the leader, teacher and overseer of the entire church. Therefore he will be deeply concerned with the work of the trustees as they administer the temporal affairs of the church. The incorporation of the church and the election of trustees is a legal procedure for the purpose of holding the church property and managing its temporal concerns according to the provision of the law.

The Trustees are to have charge of the church's property, keep it in repair and good condition, raise money for the current expenses, and the disbursement of bills due, including the pastor's salary.

Section 4 – The Keeper of Records

The recording secretary shall take all notes of all proceedings and make true-entry in his journal of all things done and passed.

Section 5 – The General Treasurer

The general treasurer shall be the custodian of the general funds of the church and shall disburse funds as authorized. All expenditures shall be signed by the pastor and secretary. He shall keep accurate accounts and present a financial statement to the general board meeting in writing. His books shall be audited by an accountant.

Section 6 – The Financial Secretary

The first tenure of office of the financial secretary and the treasurer shall be for a two-year term, after which they will be eligible for re-election to serve an equal term.

Section 7 – The Administrative Assistant

The Administrative Assistant is the head of the Secretariat. She shall direct other members of the secretariat as to their duties and responsibilities.

Article 8 - Committee and Boards

Section 1 – The Radio & Television Publication Education and Home Mission

The chairpersons of Church extension, Radio and Television Publication, Education and Home mission shall be in charge of their committee and carry out the responsibilities as designated. They shall also be on the Board of Directors.

Section 2 – The Board of Church Extension

There shall be a board of Church extension of five members, whose duties shall be to find ways and means how the church might grow physically.

Section 3 – The Board of Radio and television Publication

There shall be a board of Radio and Television publication of five members, whose duties shall be to find ways and means to reach the public through media.

Section 4 – The Board of Education

There shall be board of Education consisting five members, whose duties shall be to find ways and means of better teaching our members the word of God. The chairperson of the committee shall be the Director of Christian Education.

Section 5 – The Board of Home Mission

There shall be board of home Mission consisting of five members, whose duties shall be to care for the immediate body believers and community.

Section 6 – The Local and General Church Property

Real Estate owned by this organization shall be held in the name of Grace Christian Ministries. All real estate bought by the General Church funds shall be held by the Board of Directors.

Article 9 – Grace Teaching

We believe that all scripture is given by inspiration of God and is profitable for doctrine for reproof, for correction and instruction in righteousness. II Timothy 3: 13

We sincerely seek to adhere to the teaching of the Lord Jesus and his Apostles. Some of the principles of our teaching are:

1. Salvation through our Lord Jesus Christ exclusively
2. Repentance and remission of our sins
3. Baptism after the person is saved form in the name of Jesus.
4. The Baptism with the Holy Spirit with the initial evidence of speaking in other tongues
5. Healing in the name of Jesus Christ.
6. A life of humility, consecration and Godliness
7. The imminent pre-millennial return of our Lord Jesus Christ.
8. The resurrection and rapture of the true Church of our Lord Jesus Christ
9. The final Judgement of the living dead.
10. The final establishment of the new heaven, new earth and new Jerusalem wherein dwelleth righteousness.
11. Standing for all scripture rightly divided.

We give because we love Jesus and want to see his works carried out here. But he who sows sparingly will also reap sparingly, and he who sows bountiful will also reap bountiful. So let everyone give as his purpose in his heart, no grudgingly or out of necessity for God loves a cheerful giver. And God is able to make all grace abound towards you, that you always having all sufficiency in all things have an abundance for every good work. II Corinthians 9: 6 – 8.

We believe as Christian we are not under the law. Tithing (a tenth) started before the law. “Bring the tithes into the storehouse Malachi 3:10. The storehouse today is the local church where we receive his spiritual help, where his gospel needs are supplied. God is a cheerful giver.

EXHIBIT B
(Sabbatical Request Letter)

Grace

CHRISTIAN CHURCH

March 25, 2022

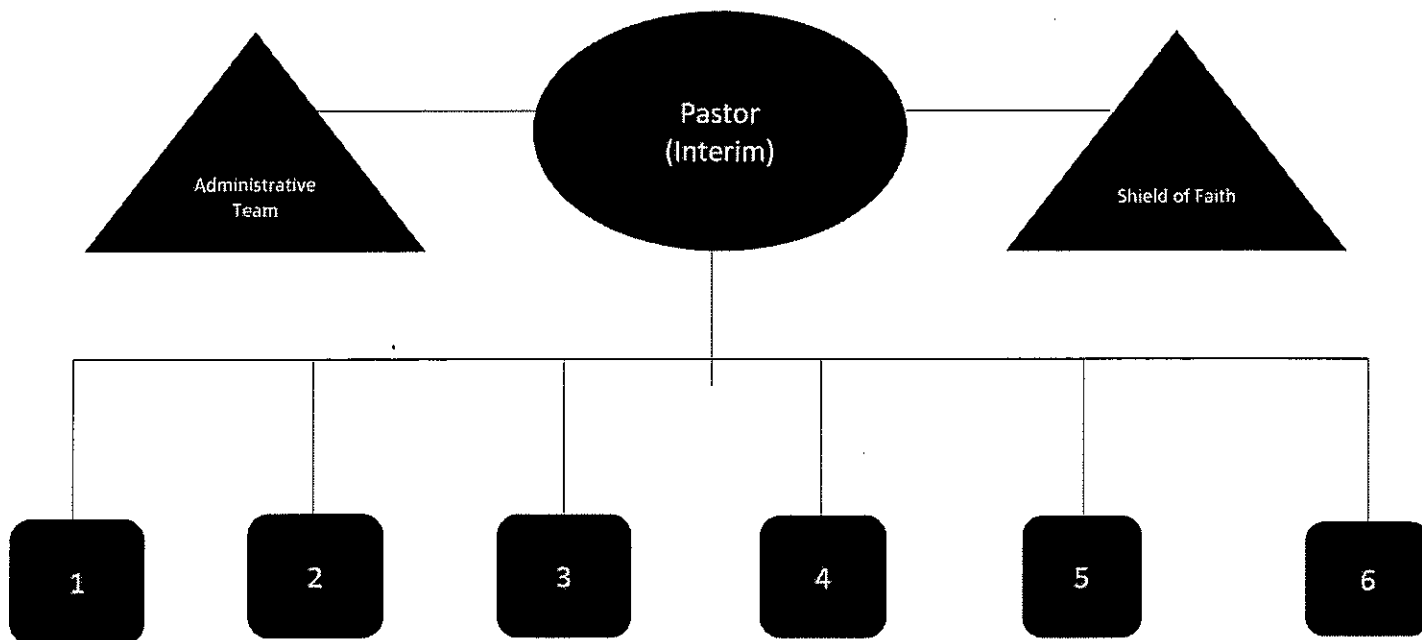
Grace Christian Church Family,

For nearly 15 years, one of the most fulfilling assignments in my life has been as the Pastor of Grace Christian Church. I genuinely believe it is my life purpose and calling to lead the people of God. Regrettably, I have entered a season where my mental health, physical fitness, and spiritual growth need restoration. Therefore, I am immediately requesting a compensated six-month sabbatical for that restoration and renewal. The official sabbatical date begins on Sunday, March 27, 2022, concluding Saturday, October 1, 2022.

As this period begins, the Church body needs to select an Interim Leader to operate for the next six months. Leadership should accomplish this progression through a vetting and voting process. Before starting the sabbatical, I will assist in transitioning to a Committee and Administrative Team. My recommendation of committee members to organize this process are:

- Elder Roderick Bishop (Chair)
- Elder Joseph Morris (Vice-Chair)
- Kenyatta Simpson (Secretary)
- Dwan Young
- Gene Sessions
- Mother Debra Wallace
- Rev. Henry Hannagan

During this time, the Interim Leader will meet with the Church's Administrative Team to lead the operations of the Church. The Administrative Team is aware of several dates and events that should be managed and executed over the next six months. There should be no significant operational changes or administrative dismissals during this time. The Interim Leader and Administrative Team are responsible for new hires and appointments. The organizational chart below should remain in place until my return.



1. **Operations:** Finance Committee, Building Management, and Supplies are presently managed by Elder Angela Bishop Hammonds.
2. **Worship & Arts:** Audiovisual Team, online worship experience, social media, musicians, and voices are presently managed by Liz Oliver.
3. **Spiritual Development:** Sunday School/Wednesday Night, Prayer Team, New Members are presently managed by Rev. Errica Bishop.
4. **Hospitality & Service:** Ushers, Gate Keepers, Security, Care Groups are presently managed by Dwan Young.
5. **Auxiliary Ministries:** Mother’s Board, Men’s Ministry, Women’s Ministry, Children and Youth Ministries, Clergy and Deacons (Communion). **I am proposing that Elder Joseph and Rev. Viola Morris manage this. This leadership will aid with the responsibility of ministries that need leadership.**
6. **TBD:** This can be a department developed for growth and advancement.

All teams, divisions, and departments should identify a leader in the interim. This will help with who reports to who. Upon my return, I will meet with all leaders to set expectations for the congregation. All roles and responsibilities should be defined by the leader of each team, division, or department. If a person is needed to assist the Interim Pastor during these six months, that person can be placed underneath the Pastor in the organization chart to help meet with the six departments. There should not be any reconfiguration of the organizational chart.

I sincerely pray that this church body continues to grow while addressing the organizational challenges that will allow me to continue to lead this church body. I will not deal with the day-to-day or week-to-week management of the church. I am, however, willing to meet with the identified Interim Pastor upon the completion of the vetting and voting process. That identified person can meet with me on a needed basis. Until that time, I am only communicating with Elder

Roderick Bishop as the Chairman of that process. Upon selecting the Interim Pastor, I will make that appointee my point of contact.

Until,

Dr. Aaron R. E. Bishop

Dr. Aaron R. E. Bishop
Pastor

EXHIBIT C
(Interim Pastor Resignation Letter)

Dear Dr. Aaron Bishop and Grace Leaders,

I am writing to inform you of my resignation as Interim Pastor of Grace Christian Church, **effective August 1st**. I want you to know that I made this decision only after careful consideration. I have enjoyed serving the people of this great church alongside each of you. I am grateful for the kindness and hospitality you have shown my family and me during this time. Although our time together was short, I have found it insightful and fulfilling.

For me, people always have and always will be my greatest priority. I'm on a mission to help as many people as possible change their life. One of the ways I live out this personal calling is by serving God's church. I take the responsibility seriously, and as soon as I sense my inability to do it effectively, I feel it best to step aside. That has been the driving force behind this decision.

I pray God's best for each of you as you move forward in pursuit of His will, both for your lives and the life of this church. May His wisdom and sovereignty lead you on.

Until change has come,

A handwritten signature in black ink, appearing to read 'Sean Dreher', with a stylized flourish at the end.

Reverend Sean Dreher

EXHIBIT D
(Sabbatical Extension Letter)

Greetings Rev. Dr. Aaron Bishop,

It is our hope that this correspondence finds you well. The purpose of this letter is to inform you of some changes as it relates to your status as Senior Pastor of Grace Christian Church.

On March 23, 2022, Grace Christian Church received a letter requesting a sabbatical. The sabbatical letter indicated that the sabbatical was set to end on October 1, 2022, and as of October 30, 2022, a return plan has not been communicated. A decision has been made by the clergy, administrative teams and church members to extend your sabbatical with a return date of 01/01/24. This allotted time period will allow for spiritual, physical, and mental restoration for you.

The terms of the Sabbatical extension are as follows:

- Refrain from conducting any spiritual, financial, business, or legal matters for Grace Christian Church.
 - This includes:
 - i. Conducting bible study, prayer meetings, business meetings or any ordinances connected to GCC.
 - ii. Acting in a pastoral or leadership position associated with GCC.
 - iii. Receiving or requesting logistical or financial information concerning GCC.
- Provide GCC with any information necessary within 72 business hours of the request.
 - This includes:
 - i. Passwords
 - ii. Security codes
 - iii. Contacts
 - iv. Log on information

Lastly, your original sabbatical request included a request for compensation from GCC. No compensation will be provided during this extended sabbatical.

All terms and conditions listed in this correspondent are effective upon receipt of this letter.

Sincerely,

Grace Christian Church Administrative Team, Grace Christian Church Clergy Team and Church Members

THIS document was written, signed and submitted with the support of the elders and leadership team of Grace Christian Church.

Initiated by: Maria Lynn Lyman
Elder Joseph Morris
Rev. Henry Ferguson
Sister Fahn
Melody Morley
Mary Spaulding
Rev. Aaron Bishop

[Signature]
David Gray

This document was written, signed and submitted with the support of the elders and leadership team of Grace Christian Church.

EXHIBIT E

(October 1, 2023, Meeting Minutes)

Grace Christian Church Special Church Meeting
Sunday October 1, 2023

The church meeting was called to order and moderated by Elder James Gibbs after worship services. The church body of Grace Christian Church were given the opportunity to express their concerns on Dr. Aaron Bishop as the Pastor of Grace Christian Church.

All written communication between Dr Aaron Bishop and the church was read by Tia Falu which included the Sabbatical letter from Dr. Aaron Bishop and the second letter sent to Dr. Bishop after no response to his return date. Members expressed their disappointment and the lack of communication from Dr Aaron Bishop after 18 months of sabbatical leave from the church. The church membership stated they supported his initial sabbatical leave however after no response to the congregation needs or attendance and seeing several public and community appearances, a decision was determined by the quorum in attendance to remove Dr. Aaron Bishop as the Senior Pastor of Grace Chistian Church.

The ballots were given out and collected by Tia Falu, Shawn Nelson and Christol Morton. The results were given to Elder James Gibbs and read to the Membership. It was a unanimous decision to request the removal Dr. Aaron Bishop as the Senior Pastor to the Board of Trustees of Greater Columbia Community Development Corporation. The letter will be written by Tia Falu and sent to the Board of Trustees.

Closing prayer was done by Elder James Gibbs

Minutes composed by Tia Falu

EXHIBIT F
(Sabbatical Conclusion Letter)



October 15, 2023

Rev. Sean Dreher
705 Ridgemont Street
Columbia, South Carolina 29203

Re: End of Pastoral Sabbatical

Dear Reverend Dreher,

I appreciate your dedicated service as the Interim Pastor at Grace Christian Church during my sabbatical. Your time, leadership, and spiritual guidance have been invaluable. After much deliberation and prayer, I have been led to conclude my sabbatical. My sabbatical ended on Monday, October 9, 2023. As I return to my pastoral duties, your role as the Interim Pastor will no longer be necessary and will conclude today, Sunday, October 15, 2023.

To navigate this transition, we scheduled a face-to-face meeting for Wednesday, October 11, 2023, at 5 p.m. You notified me that morning that you could no longer meet face-to-face but could participate in a meeting virtually. Due to the nature and importance of our discussions, a face-to-face meeting was deemed the most appropriate setting. When I inquired about another date that you would be available this week, you informed me that you would be traveling, returning late Saturday evening, thus making a face-to-face meeting this week impossible. As we were unable to meet face-to-face due to your schedule, I am in the unfortunate position of sending this letter prior to having a face-to-face meeting with you. I remain willing to meet with you to discuss matters that would be beneficial to the Church during this transition.

I am grateful for your impact on the Grace Christian Church members. I believe God has plans for you and Grace Christian Church, and I trust He will guide us on our respective journeys. I ask for your continued prayers for Grace Christian Church. I also pray for you and your ministry.

Once again, thank you for your service to Grace Christian Church.

In His Service,

A handwritten signature in black ink, appearing to read "A. Bishop", written over a white background.

Dr. Aaron R. E. Bishop
Senior Pastor

EXHIBIT G
(Cease-and-Desist Letter)



5115 Forest Drive, Ste G-1
Columbia, South Carolina 29206

(803) 542-7455 (Phone)
(803) 818-2389 (Fax)

Tuesday, October 24, 2023

To Aaron Bishop

Please be advised that I have been retained by the Board of Trustees of Grace Christian Church and Greater Columbia Community Development in a Civil action against you.

Please be advised that you are in violation of Article 5 Section 1 of Grace Christian Church Bylaws. That Section reads as follows:

"All publications and church general announcements must be submitted and approved by Grace Christian Ministries Board of Trustees prior to announcement."

On or about October 18th, 2023, a flyer was posted by you or by your instructions conveying to the public that you would be preaching at Grace Christian Church of Columbia on October 22, 2023. Please note that this social media posting is out of compliance and in violation of Article 1 of Grace Christian Church Bylaws.

Please be advised that you are to immediately **CEASE AND DESIST** publishing in any public manner including to social media sites such as to include but not be limited to Facebook, Instagram, TikTok, and the like any visual or audio advertisement affiliated in any way to Grace Christian Church or Greater Columbia Community Development

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FAX 803.818.2389




Corporation. Additionally, you are to cease publishing anything from the social media sites of Grace Christian Church or Greater Columbia Development Corporation.

This communication shall serve as official notice of the Board of Trustees decision to end your tenure as Pastor of Greater Christian Church. A formal vote on the matter is scheduled to be had via the calling of a SPECIAL MEETING on November 1, 2023, via Zoom. Notice of this Special Meeting is attached herein. At this time, we ask that you make proper arrangements to return to the Board of Trustees the keys to the church facilities, access and control of bank accounts, social media sites, and the like. Further we ask that you conduct yourself in a manner which will not bring harm to Greater Christian Church nor in a manner which will tarnish its legacy. Failure to comply with the terms described herein may result in a civil suit including a Civil Injunction being filed against.

While I am not your attorney and cannot give you legal advice should you wish to discuss this matter further, please do not hesitate to contact my office.

With Kind Regards and Best Wishes,
The Cuttino Law Firm, LLC


Shaquana Cuttino, Esquire
Attorney and Counselor at Law
thecuttinolawfirm@gmail.com

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OFFICE 833-CUTT-LAW
FAX 803.818.2389

**GREATER COLUMBIA COMMUNITY DEVELOPMENT CORPORATION
MEETING NOTICE**

The Board of Trustees of the Greater Columbia Community Development Corporation
SPECIAL MEETING

WEDNESDAY NOVEMBER 1ST 2023 6PM EST

Via Zoom:

Meeting ID: 729 2156 6181

Passcode: dB4En9

Agenda: The agenda for this Special Meeting involves the future of Grace Christian Church in terms of who will Pastor the church. We will take a vote on Aaron Bishop and his ability to continue to effectively serve as Pastor of Grace Christian Church. This meeting shall decide if Aaron Bishop will continue to serve as Pastor of Grace Christian Church.

Board of Trustees

Angela Bishop

Robin [Signature]

2023.11.01

EXHIBIT H

**(November 8, 2023 Board Meeting
Minutes)**

**Grace Christian Ministries Board of Advisories
Emergency Meeting
Wednesday, November 8, 2023, 6 pm.**

Join Zoom Meeting

<https://us06web.zoom.us/j/81262445147?pwd=rtMFJkGxSFBNIa70TfdbTz9bbYebEL.1>

Meeting ID: 812 6244 5147
Passcode: 158709

One tap mobile

+13052241968,,81262445147#,,,,*158709# US
+13092053325,,81262445147#,,,,*158709# US

Dial by your location

- +1 305 224 1968 US
- +1 309 205 3325 US
- +1 312 626 6799 US (Chicago)
- +1 646 558 8656 US (New York)
 - +1 646 931 3860 US
- +1 301 715 8592 US (Washington DC)
 - +1 669 444 9171 US
 - +1 689 278 1000 US
 - +1 719 359 4580 US
- +1 720 707 2699 US (Denver)
 - +1 253 205 0468 US
- +1 253 215 8782 US (Tacoma)
- +1 346 248 7799 US (Houston)
 - +1 360 209 5623 US
 - +1 386 347 5053 US
 - +1 507 473 4847 US
 - +1 564 217 2000 US

Meeting ID: 812 6244 5147
Passcode: 158709

Find your local number: <https://us06web.zoom.us/j/kpj0Vj6PM>

Zoom Meeting Recording Began at 6:01 pm

Attendees:

- Dr. Aaron Bishop (Board Chairman)
- Dr. Jennifer Bishop
- LaToya Quick
- Angela Hammonds
- James Quick
- John Georgia
- Bre Maxwell
- Gene Session
- Latasha Saunders
- Nikki Georgia
- Robin McRae
- Roderick Bishop
- Tony Jordan
- Will Horne

□ Lee McCord

The meeting was called to order at 6:01 pm by Chairman Dr. Aaron Bishop with an opening statement:

Opening Statement for Information Purposes:

"According to GCC bylaws Article 3 GCM Article 3 bylaws, "The Chairperson of the Board shall be the Pastor of Grace Christian Church and shall call meetings. An emergency meeting can only be called by the Pastor of the church."

Due to the emergency nature of this meeting, which does not require three weeks of announcements from the pulpit at Grace Christian Church for Greater Columbia or Grace Christian Ministries.

Per the bylaws, the Pastor/Chair can call a special meeting.

With that being said, this meeting is called to order."

Prayer by Chairman Dr. Aaron Bishop.

Agenda

1. Welcome/Prayer
2. Announcements
3. New Business
4. Adjournment

1. Welcome and Prayer by Chairman Dr. Aaron Bishop at 6:02 pm.

2. Agenda read by Chairman Dr. Aaron Bishop

- Dr. Aaron Bishop asked for the agenda to be adopted.
- Dr. Jennifer Bishop moved for the Adoption of the Agenda/Seconded by Board Member LaToya Quick
- Angela Hammonds called for discussion of the Meeting Agenda
"Can you read the agenda again? I'm sorry I didn't write it down."
"Also, what meeting is this called for?"
"What bylaws are you reading? Where are they from?"
"Are these filed with the Secretary of State's Office?"

Dr. Aaron Bishop stated that they have been emailed to you, and your attorney has them as well.

- Board Member Dr. Jennifer Bishop moved for the Adoption of the Agenda/Seconded by Board Member LaToya Quick
- **Vote called for by Board Member Gene Session**

The agenda is Adopted.

Vote Breakdown:

Yes = 10 (Board Member Gene Sessions, Board Member Jennifer Bishop, Board Member Nikki Georgia, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, Board Member John Georgia, Board Member Robin McRae, and Board Member Roderick Bishop)

No = 1 (Board Member Angela Bishop-Hammonds)

3. Announcements by Chairman Dr. Aaron Bishop

Information Items:

"This is an information item presented by Dr. Aaron Bishop, Chairman of GCM and Pastor of GCC, in accordance with Article 3 of GCM bylaws; the Ministry shall be operated by a General Board of Advisors to be known as the BOA consisting of 12 members as the 12 Apostles of Jesus Christ, in accordance with the standards set in Titus 1: 5 –16."

As of October 23, 2023, these new board of advisors have been appointed to the board in accordance with the requirements set for by the bylaws. The additional Board of Advisors are as listed:

1. Gene Session
2. Latasha Saunders
3. LaToya Quick
4. Will Horne
5. John Georgia
6. James Quick
7. Nikki Georgia

There are now 12 Board of Advisors seated.

Article 6 of the Bylaws states that the congregation cannot vote on the Pastor or Assistant Pastor. It is the duty of the Pastor to appoint. As of October 22, 2023, Dr. Jennifer Bishop has been appointed to the office of Assistant Pastor. With the Administrative Rule to let her operate as Co-Pastor."

4. New Business

Motion Made by Board Member Dr. Jennifer Bishop at 6:07 pm:

"Per Section 1 of the Grace Christian Church Bylaws and Constitution regarding the Office of Pastor, "Provided that the pastor serves satisfactorily, they shall be eligible for re-assignment as often as desired by the Board of Trustees of Grace Christian Ministries during the annual meeting." Due to actions against the constitution and bylaws of Grace Christian Ministries and Grace Christian Church on October 1, 2023,

October 4, 2023, and purportedly on November 1, 2023, I hereby move that in lieu of waiting until the annual meeting, the Grace Christian Church Ministries Board of Advisories expresses its support of Dr. Aaron Bishop to continue as Grace Christian Church's Senior Pastor to lead its ministries in all matters necessary to pursue both the Ministry and the Business of Grace Christian Church."

Seconded by Board Member LaToya Quick

Discussion by Board Member Angela Bishop-Hammonds "Per the scheduled Board Meeting held on November 1, 2023, a motion was made, and second, followed by a unanimous vote to remove Aaron Bishop as Pastor of Grace Christian Church effective November 2, 2023."

Discussion by Board Member Robin Bishop: "According to the national bylaws, as stated by our attorney, if bylaws are more than ten years old, you defer back to the national bylaws, and the national bylaws state any board member can call a meeting. In terms of the meeting on November 1, Dr. Aaron and Dr. Jennifer were not in attendance, neither did they give notice that they would not be in attendance. There is a difference between the Board of Trustees and the Board of Advisors, and I believe we need to clarify that before moving forward."

Vote Called for by Board Member Gene Session

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Board Member Dr. Jennifer Bishop requested to make a motion at 6:13 pm:

"Under Article 5 of the Grace Christian Church bylaws and constitution states, "All publications and church general announcements must be submitted and approved by Grace Christian Ministries Board of Trustees prior to announcement."

I hereby move that the Grace Christian Ministries Board of Advisories instruct Attorney Shaquana Cuttino that the cease-and-desist letter dated October 24, 2023, is hereby rescinded and that Pastor Aaron Bishop may, without any Board approval, release publications and church general announcements publicly and on any social media platforms associated with Grace Christian Church and Grace Christian Ministries, Inc. dba Greater Columbia Community Development Corporation indefinitely."

Question by Board Member Angela Bishop-Hammonds: "Could you please read that motion again?"

Board Member Dr. Jennifer Bishop reread the motion.

Motion Made by Board Member Dr. Jennifer Bishop at 6:13 pm, Seconded by Board Member James Quick, Vote Called for by Board Member Gene Session

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Motion made by Board Member Dr. Jennifer Bishop at 6:15 pm:

"Under the Church policy and procedures, in the Grace Christian Church bylaws and constitution, "The ministry shall be operated by a General Board of Advisors to be known as the BOA consisting of 12 members as the 12 apostles of Jesus Christ, in accordance with the standards set in Titus 1:5 –16."

I hereby move that the Grace Christian Ministries Board of Advisories instruct Attorney Shaquana Cuttino that the cease-and-desist letter dated October 24, 2023, is rescinded and she is disengaged as purported counsel for Grace Christian Church Board of Trustees, Greater Columbia Community Development Corporation or any other entity related to Grace Christian Church or Greater Columbia Community Development Corporation effectively immediately. No further action is authorized to be taken."

Seconded by Board Member James Quick, Vote Called for by Board Member Dr. Jennifer Bishop

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Motion Made by Board Member Dr. Jennifer Bishop at 6:16 pm:

"I hereby move that the Chairman, Dr. Aaron Bishop, have full authority to retain legal counsel paid with funds from Grace Christian Church and Greater Columbia Community Development Corporation, necessary to represent Greater Columbia Community Development Corporation, Grace Christian Ministries Board of Advisories, Grace Christian Church or any other entity related to Grace Christian Church or Greater Columbia Community Development Corporation effectively immediately and indefinitely."

Seconded by Board Member LaToya Quick, Vote Called for by Board Member Gene Session

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Motion Made by Board Member Dr. Jennifer Bishop at 6:18 pm:

"As stated in Section 5 – the Grace Christian Church Bylaws and Constitution, the general treasurer shall be the custodian of the general funds of the church and shall disburse funds as authorized. All expenditures shall be signed by the Pastor and secretary. He shall keep accurate accounts and present a financial statement to the general board meeting in writing. His books shall be audited by an accountant.

I hereby move that all persons who are on any account or in possession of any financial data related to Grace Christian Church, Greater Columbia Community Development Corporation, or any other entity associated with Grace Christian Church provide all financial data in their possession, including, bank statements, account numbers, financial institution of the account, accountings, filings and summaries to Dr. Jennifer D. Bishop, and add Dr. Aaron Bishop and Dr. Jennifer D. Bishop to all such accounts, including but not limited to all CashApp (Grace Christian Church of South Carolina and Radical Deeds) and other financial accounts on or before Friday, November 15, 2023."

Seconded by Board Member LaToya Quick,

Question by Board Member Angela Bishop-Hammonds: *"What accounts are you interested in getting information on and as of what date?"*

Vote Called for by Board Member Dr. Jennifer Bishop

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Motion Made by Board Member Dr. Jennifer Bishop at 6:20 pm

"I hereby move that the only persons authorized on bank accounts related to Greater Columbia Community Development Corporation or any other entity associated with Grace Christian Ministries, Inc. are Dr. Aaron Bishop and Dr. Jennifer Bishop. Any other persons listed are to be removed immediately."

**Seconded by Board Member LaToya Quick, Vote Called for by Board Member Dr. Jennifer Bishop
The Motion Passes.**

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

Motion Made by Board Member Dr. Jennifer Bishop at 6:21 pm:

"As stated in Section 5 – the Grace Christian Church of Bylaws and Constitution, the general treasurer shall be the custodian of the general funds of the church and shall disburse funds as authorized. All expenditures shall be signed by the Pastor and secretary. He shall keep accurate accounts and present a financial statement to the general board meeting in writing. His books shall be audited by an accountant.

I hereby move that all financial accounts related to Grace Christian Church be audited by a Certified Public Accountant (CPA). Said accountant is to be selected and retained by Pastor Aaron Bishop on behalf of Grace Christian Church and paid with funds from Grace Christian Church. The audit shall be for the period of March 1, 2022, through October 31, 2023, and the audit findings and recommendations shall be provided to the Grace Christian Ministries Board of Advisories and Pastor Bishop no later than December 31, 2023. The Board of Advisories will review the audit findings and recommendations to develop a management response and any legal recourse."

Seconded by Board Member James Quick, the vote was called for by Board Member Latasha Saunders.

The Motion Passes.

Vote Breakdown:

Yes = 8 (Board Member Gene Sessions, Board Member Nikki Georgia, Board Member Jennifer Bishop, Board Member LaToya Quick, Board Member James Quick, Board Member Will Horne, Board Member LaTasha Saunders, and Board Member John Georgia)

No = 3 (Board Member Angela Bishop-Hammonds, Board Member Robin McRae, and Board Member Roderick Bishop)

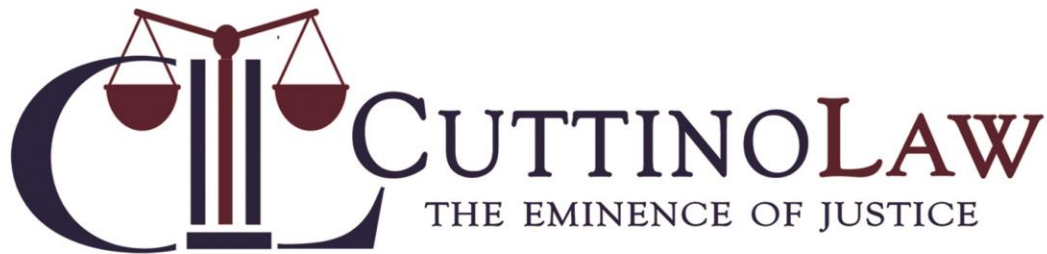
5. Adjournment

Chairman Dr. Aaron Bishop stated “We have exhausted out agenda. This meeting stands adjourned.”

The meeting was adjourned at 6:24 pm by Chairman Dr. Aaron Bishop.

EXHIBIT I

(Notice of Termination Letter)



5115 Forest Drive, Ste G-1
Columbia, South Carolina 29206

(803) 542-7455 (Phone)
(803) 818-2389 (Fax)

Monday, November 13, 2023

RE:

My Clients: The Board of Trustees of Greater Columbia Community Development Corporation, Greater Columbia Community Development Corporation, and the Board of Trustees for Grace Christian Church of South Carolina

NOTICE OF TERMINATION OF PASTORAL DUTIES

Please be advised that on November 1, 2023, a Special Meeting was held in accordance with South Carolina Code of Laws 33-31-702. All members of the Board of Directors for Grace Christian Church and Greater Columbia Community Development Corporation were sent notice of this Special Meeting via certified mail and in accordance with the South Carolina Code of Laws 33-31-822, and the South Carolina Non-Profit Corporation Act. In attendance were Board of Director members: Angela Bishop, Robin Bishop McRae, and Roderick L. Bishop Aaron Bishop and Jennifer Bishop were properly noticed but were not in attendance. The agenda for the meeting, as specified in the Notice of Special Meeting, was the future of Aaron and Jennifer Bishop Greater Columbia Community Development Corporation and Grace Christian Church of South Carolina. A vote on terminating Aaron Bishop as Pastor of Greater Columbia Community Development Corporation and of Grace Christian Church of South Carolina was held and by a quorum, the Board of Directors voted to terminate Aaron Bishop as Pastor of

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FAX 803.818.2389



Greater Columbia Community Development Corporation and of Grace Christian Church of South Carolina. At this time, we respectfully request that Aaron and Jennifer Bishop refrain from referencing themselves as Pastor and or Co-Pastor of Greater Columbia Community Development Corporation and of Grace Christian Church of South Carolina, that they refrain from entering the sanctuary without prior approval from the Board of Trustees, and that they refrain from threatening, harassing, and or intimidating in any way members of Greater Columbia Community Development Corporation and members of Grace Christian Church of South Carolina.

With Kind Regards and Best Wishes,
The Cuttino Law Firm, LLC

/s/ Shaquana Cuttino
Shaquana M.S. Cuttino, Esq.
Attorney and Counselor at Law
thecuttinofirm@gmail.com