

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

AFFIDAVIT OF  
CHRISTOPHER JONES

RECEIVED  
MAY 16 2018  
SCS Court of Appeals


I, Christopher Jones, do hereby swear under the penalties of perjury, that the statements are true and correct and is of my information and beliefs. Statements are as follows:

1. I am citizen and resident of Greenville County South Carolina.
2. That I am the Plaintiff in the instant action and Appellant in the Court of Appeals action.
3. That I have never presented myself as an attorney for anyone.
4. That I have not represented anyone in Court or filed papers on behalf of anyone for any Court action.
5. I represent myself, and have stated as such in the Record of Court.
6. That I was an original member of The Truth Outreach Church then Cornerstone cathedral Church since 2015.
7. I swear under oath that I am formal members of The Truth Outreach, West Union, which is now returned to The Cornerstone Cathedral. I am fully aware of the events relating to the Church and do have intimate knowledge thereof.
8. I am above the age of eighteen years old and is competent to give this Affidavit.
9. That I have direct personal knowledge of the events and information which I am attesting
10. That I am and was at the time in question, and continue to be a member and officer of the Cornerstone Cathedral Church, which was formally known as The Truth Outreach at 185 Cornerstone Dr. West Union South Carolina.
11. That Susan Harrison, and Pastor Desimber Rose Wattleton-Jones were members of The Truth Outreach and are now members of The Cornerstone Cathedral Church today. At no time did either of Susan Harrison or Desimber Rose Wattleton not serve as members or officers. The statements of Michael Davis, that Susan Harrison, Desimber Rose Wattleton and Christopher Jones are not members, are completely false and is without any foundation of truth.
12. At no time since joining the Cornerstone Church, formally known as Truth Outreach did either Susan Harrison, and Desimber Rose Wattleton-Jones waive their rights as

members of the Truth Outreach/Cornerstone Cathedral Church, to the best of my knowledge.

13. I see these members at the Church every time there is Church function and/or service, as well as performing as officers of the Church.
14. I do have personal knowledge of the vote to terminate Michael Davis. The vote did occur on or about February 14, 2016 with two (2) Oconee County Sheriff Deputies at the Church witnessing the vote and to make sure there is no trouble.
15. That the Oconee County Sheriff deputies did not force Michael Davis from Church property on the day of the vote. Michael Davis voluntarily left with Maria Davis.
16. Michael Davis has not been to the Cornerstone Cathedral Church formally known as Truth Outreach at West Union South Carolina for more than two (2) years.

The statements I have made are true and correct to the best of my knowledge and beliefs. Given under the penalties of perjury.



Christopher Jones, Appellant  
P.O. Box 1064  
Greenville, SC 29602  
864-999-6823

SWORN To and Subscribed Before Me,

This 14<sup>th</sup> day of May, 2018.

  
Notary Public for South Carolina

My Commission Expires: 10-20-2026



2016 MAR 31 P 3:37

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF OCONEE COUNTY	)	TENTH JUDICIAL CIRCUIT
	)	
Connie McKee	)	NOTICE OF TRANSFER OF CASE
	)	TO COURT OF COMMON PLEAS
	)	
PLAINTIFF	)	
VS	)	CASE NO. 2016-CP-37-00209
	)	(IN THE FUTURE YOU MUST USE THIS
Michael Davis and Elizabeth Estes	)	NUMBER ON ALL DOCUMENTS FILED
DEFENDANT	)	IN THIS COURT)

This case, originally filed in the Magistrate's Court, has been transferred to this Court of Common Pleas.

Any documents to be filed in this case must contain the case number and should be delivered or mailed to the Clerk of Court at this address:

Beverly H. Whitfield  
Clerk of Court  
P.O. Box 678  
Walhalla, SC 29691

Procedure in this action is now governed by the South Carolina Rules of Civil Procedure, and you are responsible for following these Rules and for serving the other party to this lawsuit or his/her attorney, with copies of any pleadings or notices you filed with the Clerk of Court.

Walhalla, South Carolina

Clerk of Court, Oconee County, S.C.

Date: 03/31/16

by: Beverly H. Whitfield / *HL*

Copy mailed to  Plaintiff or  Plaintiff's Attorney on 03/31/16 by TSH

Copy mailed to  Defendant Estes and  Defendant Davis' Attorney on 03/31/16 by TSH

✓  
ENTERED  
COMPUTER

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF OCONEE )  
 )  
 Susan Harrison and Christopher Jones )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Mitchell Eugene Davis a/k/a Mitch Davis )  
 and Michael Davis. )  
 )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 TENTH JUDICIAL CIRCUIT  
 C.A. No.: 2016-CP-37-0060

**ORDER TO CONSOLIDATE**

FILED OCONEE COUNTY, SC  
 BEVERLY H. WHITFIELD  
 CLERK OF COURT  
 2016 APR 20 A 10:48

THIS MATTER came before me, the undersigned J. Cordell Maddox, Jr., on April 13, 2016, when the parties to the above-captioned matter participated in a Status Conference before this Court. ~~Upon motion by the parties, the Court agreed to consolidate the matter of Connie McKee v. Michael Davis and Elizabeth Estes, 2016-CP-37-00209, into the proceedings of Susan Harrison and Christopher Jones v. Mitchell Eugene Davis a/k/a Mitch Davis and Michael Davis, 2016-CP-37-0060.~~ Henceforth, the foregoing actions will constitute one lawsuit styled Susan Harrison, Christopher Jones, and Connie McKee v. Mitchell Eugene Davis a/k/a Mitch Davis and Michael Davis, 2016-CP-37-0060.

NOW, THEREFORE, IT IS ORDERED that:

1. The lawsuit styled Connie McKee v. Michael Davis and Elizabeth Estes, 2016-CP-37-00209 is DISMISSED WITH PREJUDICE as to Defendant Michael Davis;
2. The lawsuits styled Connie McKee v. Michael Davis and Elizabeth Estes, 2016-CP-37-00209 and Susan Harrison and Christopher Jones v. Mitchell Eugene Davis a/k/a Mitch Davis and Michael Davis, 2016-CP-37-0060 are CONSOLIDATED into one lawsuit; and

Copies to:  
 Atty \_\_\_\_\_ (P)  
 DSS \_\_\_\_\_  
 Mailed \_\_\_\_\_ Boxed \_\_\_\_\_ handed \_\_\_\_\_

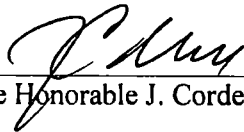
*Mixson, prose*  
*Other*  
*Estes, prose*  
 ENTERED  
 COMPLETED

3. Henceforth, any documents to be filed in this case must contain the case number 2016-CP-37-0060.

The presiding judge of this Court shall retain jurisdiction of this matter.

IT IS SO ORDERED.

April 18, 2016.

  
The Honorable J. Cordell Maddox, Jr.

FILED OCONEE COUNTY, SC  
BEVERLY H. WHITEFIELD  
CLERK OF COURT  
2016 APR 20 A 10:43

Exhibit D

## THE TRUTH OUTREACH CHURCH

### RESOLUTION

The undersigned, constituting the Secretary/Clerk of The Truth Outreach Church f/k/a/ The Cornerstone Cathedral, ("Truth Outreach"), hereby certifies that at a properly noticed and duly called congregational meeting, taking place on January 13, 2016 at which a quorum was present and voting, the following resolutions were adopted unanimously:

**RESOLVED**, The Truth Outreach hereby consents to a loan and/or line of credit from Community First Bank or any other acceptable source, ("Lender") in the original principal amount of \$8,500 (the "Loan"), to be unsecured by the Church, and will not require an assignment of the revenues and income from the new construction property at and near the Timber Creek Subdivision, West Union, South Carolina, for the purpose of working capital for Truth Outreach Development Corp., related entities, and new construction of single family residences.

**FURTHER RESOLVED**, that Pastor Michael Davis and Desimber Rose Wattleton of The Truth Outreach Church are authorized, empowered and directed to execute and deliver on behalf of The Truth Outreach Church any and all instruments, documents, notices, certificates, or other writings, deemed or required, necessary or convenient in order to effectuate the transactions described in the foregoing resolution in each and every jurisdiction and that such execution shall be solely effective to bind Company under such terms thereof.

**FURTHER RESOLVED**, that the Trustees of The Truth Outreach Church shall hold in trust the church property. Accordingly, Christopher Jones, Judy Rogers, Marvin Peeler and Elizabeth Estes (collectively the "Trustees"), Trustees of The Truth Outreach Church are empowered and directed to execute and deliver on behalf of Pastor Michael Davis and on behalf of The Truth Outreach Church, a Note to Community First Bank for new development purposes.

**FURTHER RESOLVED**, that all such actions described in the proceeding resolutions taken by Pastor Michael Davis along with Desimber Rose Wattleton and the Trustees, and any person authorized to act by Pastor Michael Davis, Associate Pastor Desimber Rose Wattleton and the Trustees, which acts would have been authorized by the foregoing resolutions except that such acts were taken prior to the adoption of such resolutions, are hereby severally ratified, confirmed, and approved, and adopted as acts on behalf of The Truth Outreach Church.

**FURTHER RESOLVED**, that any such document or instrument signed by Michael Davis and/or Desimber Rose Wattleton and the Trustees, pursuant to the foregoing resolution shall be conclusive evidence in favor of every person relying upon or claiming under any such document or instrument was executed in accordance with the South Carolina Non-Profit Corporation Act or by the By-Laws of The Truth Outreach and is binding upon the Members thereof.

**FURTHER RESOLVED**, that this Resolution shall be entered upon the minutes and Records of The Truth Outreach Church.

**IN WITNESS WHEREOF**, the undersigned, being the Secretary/Clerk of The Truth Outreach Church, has executed this Resolution as of the 14<sup>th</sup> day of January, ~~2015~~ 2016

The Truth Outreach Church

By: Michael Davis  
Name: Michael Davis  
Its: Senior Pastor.

By: Desimber Rose Wattleton  
Name: Desimber Rose Wattleton  
Its: Associate Pastor/Secretary

By: Judy Rogers  
Name: Judy, ROGERS  
Its: Board Chairperson

Witnesses:

ATTEST: Elizabeth Estes  
Elizabeth Estes, Treasurer

ATTEST: Marvin Peeler  
Marvin Peeler, Trustee

Christopher Jones  
P.O. Box 1069  
Greenville, SC 29602



**RECEIVED**

MAY 16 2018

SC Court of Appeals

S.C. Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

0076

