

4. Plaintiff has attended Concord United Methodist Church (CUMC) and has made annual financial pledges to it for about 15 years. He joined it by profession of faith in 2015.
5. Defendant has been an Associate Minister or Senior Minister at Concord United Methodist Church throughout this time.
6. The Book of Discipline of the United Methodist Church (UMC) “constitutes its law and doctrine.” It is updated every four years, as a result of the quadrennial General Conference of the UMC. The current version is 2016, but in the matters relevant to this complaint, there is no substantial difference between it and the 2012 version.¹
7. By the Preamble of its Constitution, the UMC seeks “...the redemption of the world.” By its membership vows, professing members of the UMC “covenant together with God and with members of the local church” to “reject the evil powers of the world,” and “resist evil, injustice, and oppression.”²
8. The Plaintiff’s public witness is that he has, at the cost of much persecution,

¹ See <http://firstumcjc.com/2016-book-of-discipline/> for an online version of the 2016 Book of Discipline.

² The Book of Discipline is organized by “paragraphs” (symbolized by ¶, even though the “paragraphs” in the Book of Discipline may be many paragraphs in length). The Preamble of the Constitution immediately precedes ¶ 1. The membership vows are in ¶ 217.

risk, loss, and exertion, “rejected evil powers in the world,” and “resisted evil, injustice and oppression” for a quarter century as a licensed professional engineer (PE), employed by the U.S. Department of Energy (DOE) in a position with significant public (including workplace) health and safety responsibilities.³

9. The Plaintiff’s witness is that he has done this to be faithful to God’s will for “the redemption of the world,” when the time seems short as the perils facing humanity are unprecedented and growing.^{4 5}
10. In the Summer of 2015, the Plaintiff, after being told by his Congressman, John Duncan, that expressions of interest, such as by his faith community’s leadership, would give him more reason and influence to bring

³ See www.CarsonversusDOE.com and www.broken-covenant.org. Plaintiff’s putting his duty to protect the health and safety of others in DOE facilities before his professional standing and economic self-interest played a positive, possibly significant, role in passage of a landmark law in 2000 by which over 100,000 diseased, disabled or prematurely deceased DOE workers or their survivors have received over 10 billion dollars in compensation for working in DOE’s unsafe and unhealthy facilities during the Cold War.

⁴ The plaintiff is on public record that he has reasonable belief in “civilization-threatening” law-breaking in the Executive Branch of the federal government - and if civilization collapses in coming decades, with attendant billions of unnatural deaths, it will be anything but “the redemption of the world” - it will be its destruction.

By the rules of professional conduct of his PE licensing authority, he can be disciplined for making such claims without reasonable belief. His licensing authority in Tennessee investigated the basis in law and fact of his claims and declined to contest their reasonable basis.

⁵ See ¶ 165 (the first paragraph) of the Book of Discipline for a similar appraisal of civilization’s prospects of sustaining to year 2100.

Congressional oversight to resolving his claims of decades-long, compounded, continuing, civilization-threatening, law-breaking in federal agencies U.S. Office of Special Counsel (OSC) and U.S. Merit Systems Protection Board (MSPB), requested the Defendant to do something other than bystand to his concerns.

11. Defendant refused to do other than bystand, so Plaintiff asked him to file a misconduct complaint against him, per the Book of Discipline, for Plaintiff's stating Defendant's bystanding was professional misconduct by the Book of Discipline - that if the Defendant believed the Book of Discipline allowed him to bystand, he should allege that the Plaintiff was engaged "in behaviors that undermine (his) ministry" by claiming Defendant's bystanding was professionally blameworthy.⁶
12. Defendant refused to do that also, so Plaintiff then filed a misconduct complaint, per the Book of Discipline, against Defendant.⁷
13. In Plaintiff's opinion, the Presiding Bishop of the Holston Conference of the UMC, MaryVirginia Taylor, together with her cabinet, violated the spirit, if

⁶ See ¶¶ 217, 221, 228, 362, 2701, and 2702 for the basis and process by which a professing member can be disciplined in the UMC.

⁷ See ¶¶ 362, 2701, and 2702 for the basis and process by which a clergy member can be disciplined in the UMC.

not letter, of the Book of Discipline, by not allowing any lay member of the Holston Conference any role before they closed the complaint, without investigation. There was no attempt of a “just resolution,” despite Plaintiff’s request for one. ⁸

14. Plaintiff then filed a misconduct complaint against Bishop Taylor, per the Book of Discipline. It too was closed without being investigated or considered by any lay member of the UMC. ⁹

15. After this, the Plaintiff made clear to Defendant that Plaintiff would continue to pursue his claims of Defendant’s professional misconduct by publicizing them to the general CUMC membership. ¹⁰

⁸ A reading of the Book of Discipline’s disciplinary process shows its focus on “just resolution” in such situations, for instance ¶ 362.1 and ¶362.1c. A “just resolution” is described as being “one that focuses on repairing any harm to people and communities, achieving real accountability by making things right in so far as possible and bringing healing to all the parties.” No one from the Bishop’s office even spoke with Plaintiff about his complaint before it was summarily closed - so much for a “just resolution.”

The Bishop’s cabinet members have one-year, renewable terms. The Bishop can assign them anywhere in the Holston Conference when their annual term expires if they displease her, such as by calling for a “just resolution” to a complaint the Bishop wants buried, without the involvement of any lay member of the Holston Conference.

⁹ By the Book of Discipline, the complaint of a professing member against a clergy member can summarily dismissed by other UMC clergy members, without any lay member involvement. In contrast, when a complaint is filed against a professing member by a clergy member, the complaint must be investigated and the professing member can demand a church trial (with possible subsequent appeals) - a number of other lay members will be involved as investigators, jurors and/or judges.

¹⁰ Plaintiff is not optimistic that those born in 2017 will get to die natural deaths, not given the unprecedented challenges facing our unprecedented global civilization. Out of love of

16. As a result, apparently to drive plaintiff from membership in CUMC and damage his credibility, the Defendant started to defame him as a “threat of violence” and engage in cyber-bulling against him. ¹¹
17. Plaintiff is now 63 years old, with a spotless personal and professional record. He has held a high security clearance for over 30 years. He has never threatened anyone with anything unlawful. The established legal record is quite the contrary - that Plaintiff will pay a high cost to non-violently confront, via rule of law, law-breaking entities that have harmed or killed thousands of loyal, patriotic, God-fearing, Americans.
18. Regardless, the Book of Discipline explicitly addresses how Defendant is required to behave in situations as this - and it is not by defaming Plaintiff as a threat of violence and engaging in cyber-bullying against him to drive them from Church membership. ¹²

God and man, plaintiff’s response to this all-too-likely possibility of civilizational collapse in coming decades is “but not through me.”

¹¹ This includes Defendant’s efforts to destroy his reputation with defamation that plaintiff is a “threat of violence” and instructions that Plaintiff should therefore be searched when he entered the church and be escorted and accompanied in his Sunday School class.

If defendant had any objective basis for such concerns, the Book of Discipline at ¶ 221 should have been the starting point. Instead, the starting point for Defendant was causing the Plaintiff to be publicly humiliated by being searched and escorted in the church.

¹² See ¶¶ 221, 228.2b5, 362.1 and 362.1c about this process and its objective of a “just resolution,” which is described as being “one that focuses on repairing any harm to people and communities, achieving real accountability by making things right in so far as possible and

19. This suit could be resolved readily - all the Defendant has to do is file a misconduct complaint, per the Book of Discipline, against the Plaintiff and Plaintiff will withdraw this suit. But Defendant has said repeatedly that he will not do so - what corruption and evil is he trying to hide that might be exposed in the investigation and church trial, conducted per the Book of Discipline, that would result from his filing a complaint against the Plaintiff?
20. How many lives is Defendant putting at risk because of his bystanding - and now active evil of defamation - to the evil and injustice Plaintiff is confronting, non-violently, via rule of law, because Plaintiff reasonably believes it to be a threat to UMC's mission for the "redemption of the world?"
21. For these reasons, Plaintiff seeks \$50,000.00 in damages, while he prays that the lay leadership of CUMC, per their covenant vows with the UMC

bringing healing to all the parties."

In contrast to a "just resolution," plaintiff suspects, he hopes incorrectly, that the Defendant's intention in defaming plaintiff as a threat of violence was to foment violence against Plaintiff - that a "just resolution" in the Defendant's eyes might well include Plaintiff's being murdered as a result of Defendant's defamation.

Plaintiff also suspects that one or more members of CUMC and/or members of his family broke the law in providing the Defendant information about the Plaintiff, from his employer's records and/or police records to which they had no right and/or no right to share with Defendant. Defendant could now be trying to protect their misconduct too.

and CUMC, will insist that the Book of Discipline be adhered to in this matter, so the church can stop being scandalized with this civil suit.^{13 14}

Respectfully Submitted,

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¹³ Had Defendant complied with his vows and duties at CUMC, plaintiff possibly avoids incurring over \$50,000.00 in legal costs in past two years, because Congressman Duncan then uses his office to spur an objective resolution of Plaintiff's claims of law-breaking in federal agencies OSC and MSPB - thereby also advancing UMC's mission for the "redemption of the world."

¹⁴ See ¶¶ 217 and 221, also see 1 Cor. 6:6