

suspicion that Rev. Trotter, via the wrongdoing of current or former employees of the Department fo Energy and/or Knox County Sheriff's office who are current members of Concord United Methodist Church and/or family members, unlawfully obtained information about Mr. Carson from their employers, and takes no exception to Mr. Carson's suspicion (which he would prefer to be dispelled) that Rev. Trotter's defamation was possibly intended to foment violence against Mr. Carson, where he might be murdered by an unstable member of the Church who thought they were doing God's will to protect Rev. Trotter's role as senior minister.²

Defendant's motion also takes no exception to Rev. Trotter's bystanding, contrary to his vows, duties of his appointment, and Book of Discipline to Mr. Carson's reasonably evidenced claims of federal agency law-breaking that, in Mr. Carson's opinion, has contributed to immense harm and damage to American health, safety, security, and welfare in past 40 years and which puts East Tennessee, as rest of America and world at unnecessarily increased risk of a nuclear 9/11, disastrous nuclear accident, or other, possibly civilization-threatening event.

² See Plaintiff's complaint ¶¶ 16 (with footnote 11) and 18 (with footnote 12).

Mr. Carson is on public record that he has dedicated himself, whatever the risk, to non-violent, lawful, “behaviors that undermine the ministry of a person (Rev. Trotter) serving within an appointment (as senior minister of Concord United Methodist Church.”³

Defendant does not claim - and cannot claim - that he is complying with the United Methodist Church Book of Discipline in this matter. He cannot claim it, because the only reason this suit exists is because he has repeatedly refused to comply with his duty to file or allow a misconduct complaint against Mr. Carson per the Book of Discipline, even as Defendant publicly describes, in an email to church membership, how Mr. Carson is disobedient to the order and discipline of the United Methodist Church, contrary to ¶ 2702.3(c).

The apparent reason Rev. Trotter refuses to file one - and, instead engages in defamation intended to drive Mr. Carson from the congregation - is that if such a complaint were filed, it would result in an investigation by a committee that would include lay members of the Oak Ridge District of the UMC, which could - at long last - also consider and investigate Mr. Carson’s claims against Rev.

³ This a “chargeable offense” by Book of Discipline ¶2702.3(j) and Mr. Carson should be found blameworthy if he cannot demonstrate an affirmative defense - that his behaviors were the result of Mr. Carson having at least reasonable belief that Rev. Trotter had or was committing “chargeable offenses” per ¶ 2702.1 of the Book of Discipline.

Trotter and other involved Christian religious professionals.

Mr. Carson prays this Court, in determining subject matter jurisdiction, will to consider whether the only reason this suit exists is because Rev. Trotter and Christian religious professionals involved are violating the UMC Book of Discipline in not filing a complaint against Mr. Carson - to prevent Mr. Carson from having the opportunity, at a church trial, to demonstrate his obedience to his membership vows in the UMC - and Rev. Trotter's (and other involved Christian religious professionals) disobedience to their vows, the duties of their appointments, and the order and discipline of the UMC.

Mr. Carson prays the Court will also consider the public health, safety, and security risks to this community which Rev. Trotter's apparent greed-driven bystanding enables.

Defendant's representative, Mr. Priest, is a long-time member of Concord United Methodist Church. Mr. Carson hopes the Court asks Mr. Priest why this matter is in front of this court - why Rev. Trotter refuses to file or allow a complaint to be filed against Mr. Carson per the Book of Discipline. If Mr. Priest is unable or unwilling to answer, then Mr. Carson hopes this Court asks Mr. Priest to explain why this Court should dismiss the case before such a complaint is filed.

Concord United Methodist Church receives extensive tax benefits from

society. To qualify for such treatment, it should comply with its internal governance documents.

Would this Court dismiss this case if it involved claims of child abuse? Recent history shows that Christian religious professionals have frequently harmed people with impunity - hiding their professional misconduct behind claims of religion and church-state separation.

For all these reasons, Mr. Carson hopes the Court will deny the motion to dismiss at this point, but will reconsider if and when Rev. Trotter files or allows a misconduct complaint to be filed against Mr. Carson. ⁴

Respectfully Submitted,

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⁴ The Court would not have to reconsider, Mr. Carson will withdraw the suit if a complaint is filed against him by the Book of Discipline.

CERTIFICATE OF SERVICE

I certify that the following document for this case:

1. Opposition to Defendant's motion to dismiss

was served by mail on December 5, 2017, on:

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Plaintiff

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