

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

CHRIST APOSTOLIC TEMPLE, Inc.,)	
DWIGHT REED and JORDAN REED)	
)	
Plaintiffs,)	No. LAACL152830
)	
vs.)	
)	FIRST AMENDED PETITION
DEMETRIUS SINEGAL,)	
THE KINGDOM CHURCH, and)	
SAFEHOUSE #UNMUZZLED)	
)	
Defendants)	

COMES NOW the Plaintiffs, through their lawyers, and for this Petition and Jury Demand, states:

INTRODUCTION

1. The amount in controversy as a result of the events alleged in this petition is in excess of the amount necessary for the maintenance of this action in the Iowa District Court for Polk County and exceeds the jurisdictional requirements set forth in Rule 6.3 of the Iowa Rules of Appellate Procedure.

2. Christ Apostolic Temple, Inc. (hereinafter the “Temple”), Dwight Reed (hereinafter “Bishop Reed”) and Jordan Reed (hereinafter “Mrs. Reed”) demand that the issues set forth below be submitted to trial by jury.

PARTIES AND JURISDICTION

3. The Temple is a non-profit Iowa entity with its principal place of business in Des Moines, Polk County, Iowa. The Temple is a religious institution.

4. Bishop Reed is a bishop consecrated in the Apostolic faith and was selected to serve as the Temple’s pastor by unanimous vote of the Temple in December

2017. Bishop Reed succeeded his father, Bishop Jeremiah Reed.

5. Mrs. Reed is the lawful wife of Bishop Reed as of the date of their marriage on November 15, 2021 to the present.

6. Demetrius Sinegal (hereinafter “Sinegal”) represents himself as a pastor in the Apostolic faith and resides in Texas. However, he appears to actively travel the United States for speaking engagements and has an active on-line presence and fundraising machine.

7. Sinegal represents that he is the CEO and senior pastor for The Kingdom Church and describes it as a religious organization with a principal place of business in Missouri City, Texas. Despite this representation, the Kingdom Church does not appear to have a church at the address Sinegal advertises on-line and does not appear to be incorporated in the State of Texas. To that end, Sinegal may be doing business under the name of the Kingdom Church.

8. Sinegal represents that he is the founder of Safehouse #Unmuzzled (“Safehouse”) which he describes as a not-for-profit advocacy group. Safehouse does not appear to be incorporated in the State of Texas and no place of business has been made public. To that end, Sinegal may be doing business under the name of Safehouse as well.

9. Sinegal is an authorized agent for The Kingdom Church, and Safehouse and was, at all times herein, acting within the scope of his agency for each.

10. The damages Plaintiffs have suffered as a result of the behavior of each of the named Defendants exceeds the jurisdictional requirements for the amount in controversy.

11. Jurisdiction is conferred upon this Court pursuant to Iowa Code

§602.6101.

12. Venue is conferred pursuant to Iowa Code §616.18

BACKGROUND

13. The Temple was founded in 1969 (initially known as Calvary Church of God) and has grown to be the largest predominately African American church in the state of Iowa with approximately 800 members.

14. The Temple was founded by Bishop Jeremiah Reed and his wife, Dr. Willie Mae Reed (hereinafter “the Founders”). The Founders presided over the Temple’s congregation and various interests until they began to decline in health.

15. Bishop Reed had served as the pastor of churches outside of Iowa but returned to Iowa in 2017 to help in the care of his parents, the Founders.

16. In December 2017, Bishop Reed was selected by the Board of the Temple to serve as the presiding pastor and Bishop Reed has served in that capacity until the present day. Under his leadership, the Temple has initiated and/or continued a number of community outreach programs to include: (a) a program to assist citizens returning from prison with pre-employment training; (b) a mental health and substance abuse agency to assist those with mental health and substance abuse issues; (c) a weekly program to assist those in the community living with anxiety; (d) weekly Alcoholics Anonymous, Gamblers Anonymous and Narcotics Anonymous meetings; (e) a coding class to teach young adults how to code in order to pursue employment opportunities; (f) a Youth Summit; (g) a food pantry twice weekly where citizens in the Greater Des Moines Metropolitan area can come and receive free food; (h) a service to provides electronics, clothing and household items to those in need; (i) a free COVID-19 Vaccination Clinic

twice monthly; and (j) a senior citizen ministry to provide seniors with care packages, food and prepared meals as well as ministry visits.

17. The Temple also has an affiliated school called the JW Reed Academy. Bishop Reed is not the dean of the school nor is he involved in the day to day operations. The school is run by a board of directors, principal, assistant principal and teaching staff.

18. Mrs. Reed married Bishop Reed on November 15, 2021. She was not pregnant prior to marriage, nor had she engaged in premarital sex with Bishop Reed.

19. There is a 43-year age difference between Bishop Reed and Mrs. Reed.

20. In early 2022, Sinegal began to spearhead an effort to smear Bishop Reed, Mrs. Reed and the Temple over the purported inappropriate nature of Bishop Reed and Mrs. Reed's marriage. All of Sinegal's actions alleged herein were in his personal capacity and in furtherance of his agency with the Kingdom Church and Safehouse.

21. Sinegal began to attack the Plaintiffs through several mediums to include, but not limited to: Facebook posts, Youtube programs, podcasts, and a social media hosting site called Clubhouse.

22. Sinegal's attacks include Facebook posts made on March 14, twice on March 16, March 20, twice on March 22, twice on March 24, March 25, March 28, March 30, April 4, April 6, 2022 and continue to the present day. Sinegal's Facebook account lists 11,000 followers and the posts in question often times show they have been shared many times, often at Sinegal's request. Sinegal's Facebook page also provides "followers" multiple convenient ways to financial contribute to him, Kingdom Church and Safehouse through Cashapp, through text message and through a secured online giving portal with convenient suggested donation amounts ranging from \$10 to \$2,500

per donation. These Facebook posts have been shared over other social media with some having been viewed over 34,000 times.

23. Sinegal has also leveled attacks against plaintiff on Youtube videos posted on March 17, March 18, March 20, March 24, March 25 and continuing. Those videos have been viewed over 42,000 times.

24. Siengal has also leveled his attacks on at least one podcast (Muzzle is Off Podcast) which has been viewed at least 1,400 times.

25. Sinegal has also leveled his attacks on a forum called Clubhouse on at least April 6, March 31, March 17 and continuing where he serves as “leader” with over 10 hours of attacks. These events are shared over other social media mediums spreading the content.

26. Sinegal initiated a Change.org Petition to “investigate Bishop Reed” that he steers viewers / listeners to from his other social media accounts. To date, the petition has been signed by over 6,400 purported individuals.

27. In most, if not all, of Sinegal’s social media attacks he requests viewers / listeners to share his comments with people in Des Moines, Iowa to include current Temple members, past Temple members and the local media to gain further “attention” to his claims.

28. As a result of Sinegal’s efforts, the Des Moines Register ran an article on April 2 which repeats some of Sinegal’s attacks. The Des Moines register circulates the paper to approximately 33,000 Iowans daily and carries an on-line version as well.

29. Sinegal further participated in speaking engagement in Des Moines, Iowa planned on April 13, 2022, where he held a press conference repeating his attacks on

plaintiffs, published a video advocating criminal prosecution, and held an evening service where he repeated his attacks and requested financial contributions.

30. Plaintiffs requested Sinegal and Kingdom Church cease and desist in the relentless attack campaign on or about March 23, 2022. That request was ignored and the attacks have persisted.

31. Sinegal's attacks against plaintiffs are too lengthy to enumerate but include the following:

- a. claims Bishop Reed is a "child predator";
- b. claims Bishop Reed "used his power as pastor to groom a teenager";
- c. claiming Bishop Reed as "misused his pastoral power";
- d. refers to Bishop Reed by saying "the children of darkness are very cunning";
- e. claims Bishop Reed has "no ethics" and "no integrity";
- f. claims Bishop Reed is "wicked";
- g. claims Bishop Reed has engaged in a "perverse use of the pulpit";
- h. claims Mrs. Reed is a "victim" and did not marry of her own free will;
- i. claims there is "nothing safe about" the Temple;
- j. claims Bishop Reed was "after [Mrs. Reed] since she was 15 years of age";
- k. claims the Temple is a "cult";
- l. claims Bishop Reed is a "shepard that has starved his flock to feed

himself”;

m. claims Bishop Reed should be “purged” and “put out of that church”;

n. claims the Temple is “co-signing wickedness”;

o. compared Bishop Reed to musician and convicted sex offender R. Kelly and Mrs. Reed to one of R. Kelly’s victims;

p. claims Bishop Reed was the dean of the school Mrs. Reed graduated from, her “counselor” and “this is what grooming looks like”;

q. claims Bishop Reed is a “warlock” and has people in the Temple “praying witchcraft prayers”;

r. claims the Temple has an “abusive culture”;

s. claims Bishop Reed has engaged in “clergy abuse”;

t. claims Bishop Reed stole family property;

u. claims Bishop Reed provided funding for GG’s Chicken and Waffles (a restaurant owned by Mrs. Reed’s relatives) so he could have permission to marry Mrs. Reed;

v. claims Bishop Reed had Mrs. Reed’s mother put in a mental hospital the week of the wedding to allow wedding to proceed;

w. claims Jordan Reed suffers from Stockholm syndrome;

x. claims Bishop Reed misappropriate Temple assets;

y. claims the Reed marriage is nothing more than “contracted abuse” and a “marriage to her abuser;”

z. claims Bishop Reed “assumed leadership [of the Temple] under

suspicious circumstances;” and

aa. claims Bishop Reed is guilty of a criminal violation of Iowa Code § 709 as a D felony.

32. While Sinegal claims “he has nothing to gain from” his attacks on plaintiffs, his attacks are always linked to an easy means to financially contribute to him, Kingdom Church and Safehouse. In essence, he has created a maelstrom of controversy, over which he is the admitted “spearhead” and from which he is the direct financial beneficiary by funneling money to organizations over which he has control and from which he is compensated. This financial connection to a manufactured controversy has happened before and led others to level claims that Sinegal operates as a “church snatcher, petty hustler, liar and a thief.”

33. Sinegal’s attacks are designed to question plaintiffs’ integrity and moral character, expose plaintiffs to public hatred, contempt or ridicule, deprive the plaintiffs of the benefits of public confidence and social dealings, injure the plaintiffs in the maintenance of their business, and injure the plaintiffs’ reputation and standing in the community. More specifically, Sinegal’s claims Bishop Reed has engaged in sexual assault under Iowa Code and, in fact, Sinegal, for this very reason, often tells listeners he is communicating with the Iowa Attorney General’s office and local law enforcement so charges may be pursued.

34. Sinegal’s attacks have had some of their desired effects. Plaintiffs have been regularly harassed on-line, unidentified young men have been coming to the home to harass Bishop Reed and Mrs. Reed, there has been a decline in Temple membership, a decline in tithing, excessive and harassing phone calls, and harassing messages, and

threats through messenger apps.

COUNT I – LIBEL PER SE
(ALL PLAINTIFFS v. ALL DEFENDANTS)

35. Plaintiffs reasserts the paragraphs previously alleged in this Petition as though fully set forth herein.

36. Defendants made statements knowing they would attack the plaintiffs' integrity and moral character, expose plaintiffs to public hatred, contempt or ridicule, deprive the plaintiffs of the benefits of public confidence and social dealings, injure the plaintiffs in the maintenance of their business and cause a listener to infer Bishop Reed has engaged in sexual assault under Iowa Code 709.

37. Defendants made the statements over multiple social media platforms and to local media for publication, which they knew would cause the statements to be disseminated throughout the state of Iowa, and nationally.

38. The statements are false, intended to injure plaintiffs' reputation, and intended to expose plaintiffs to public contempt and ridicule.

39. Defendants prepared the false and defamatory statements and subsequently disseminated them for mass publication with malice and in wanton, intentional disregard for the truth and plaintiffs' rights.

40. Indeed, the purpose of preparing and publishing the statements was to damage plaintiffs' reputations and standing within the community.

41. The statements by Defendants proximately caused and continues to cause plaintiffs damages, including damages to their reputation, emotional distress, the general damages that are presumed to result from the communication of libelous statements, and attorney fees.

42. Plaintiffs have sustained and will continue to sustain damages as a result of Defendants' conduct, including, but not limited to:

- a. Severe past emotional distress;
- b. Severe future emotional distress;
- c. Loss of revenue;
- d. Loss of reputation and good standing in the community;
- e. Punitive damages and attorney fees.

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendants in an amount in excess of One Million Five Hundred Thousand Dollars (\$1,500,000), including costs, interests, attorney fees, actual damages, punitive damages, and for any other relief deemed appropriate under the circumstances.

COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(PLAINTIFFS DWIGHT AND JORDAN REED v. ALL DEFENDANTS)

43. Plaintiffs reasserts the paragraphs previously alleged in this Petition as though fully set forth herein.

44. Defendants conduct in spreading false and defamatory comments about Plaintiffs Dwight and Jordan Reed and inciting public opposition to their marriage constitutes outrageous conduct.

45. Defendants acted to intentionally cause emotional distress to Dwight and Jordan Reed and/or acted with reckless disregard to the probability of causing emotional distress.

46. Plaintiffs Dwight and Jordan Reed have suffered and will continue to suffer severe or extreme emotional distress.

47. The Defendants' outrageous conduct was a proximate cause of the emotional distress.

48. The statements by Defendants proximately caused and continues to cause emotional distress damages.

49. Plaintiffs have sustained and will continue to sustain damages as a result of Defendants' conduct, including, but not limited to:

- a. Severe past emotional distress;
- b. Severe future emotional distress;
- c. Punitive damages and attorney fees.

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendants in an amount in excess of One Million Five Hundred Thousand Dollars (\$1,500,000), including costs, interests, attorney fees, actual damages, punitive damages, and for any other relief deemed appropriate under the circumstances.

JURY DEMAND

Plaintiffs demand a trial by jury.

Respectfully submitted:

QUILTY LAW FIRM

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