UNITED STATES DISTRICT COURT THE NORTHERN DISTRICT OF TEXAS - FORT WORTH DIVISION

JOSIAH JOHNSON and	§
JENNIFER JOHNSON,	§
Plaintiffs,	§
	§
V.	§
	§
JEREMIAH JOHNSON,	§
THE ALTAR GLOBAL INC.,	§
PAUL JOHNSON, AND	§
PAUL T. JOHNSON MINISTRIES.	§
Defendants.	§

JURY DEMANDED

PLAINTIFFS' ORIGINAL COMPLAINT AND REQUEST FOR PERMANENT INJUNCTION

Comes now, Josiah Johnson ("Josiah") and Jennifer Johnson ("Jennifer"), corporately ("Plaintiffs"), to file this Original Complaint under the court's diversity jurisdiction seeking restitution for defamation under Texas law for defamation by Jeremiah Johnson ("Jeremiah") personally and in his capacity as principal of Altar Global Inc and Paul Johnson ("Paul"), personally and in his capacity as principal of Paul T. Johnson Ministries.

Plaintiff files this Original Complaint to seek redress for Defendants' injurious actions, vindicate their reputations, and permanently enjoin Defendants' publication of untrue and malicious defamatory statements.

I. DEMAND FOR JURY TRIAL

1. Plaintiff demands a jury trial.

II. PARTIES

2. Plaintiff Josiah Johnson is a U.S. citizen currently residing in Tarrant County, Texas, and may be contacted through his attorney of record the undersigned.

3. Plaintiff Jennifer Johnson is a U.S. citizen currently residing in Tarrant County, Texas, and may be contacted through her attorney of record the undersigned.

4. Defendant Jeremiah Johnson is sued in his personal capacity, and as the principal of The Altar Global Inc. and can be served at his residence, at

, or wherever he can be found.

5. Defendant The Altar Global Inc. is a religious nonprofit designated as a tax exempt 501(c)(3) organization at 2705 Moose Rd, Kannapolis, NC 28083, which may be served with process to Jeremiah Johnson.

6. Defendant Paul Johnson is sued in his personal capacity, and as the principal of Paul T. Johnson Ministries and can be served at his residence, at

or wherever he can be found.

7. Defendant Paul T. Johnson Ministries is a religious nonprofit claiming to be a tax exempt 501(c)(3) organization located at 10748 Cyrus Dr, Indianapolis, IN, 46231, where service can be made to its president Paul Johnson, or

, or wherever he can be found.

III. JURISDICTION AND VENUE

8. This Court has jurisdiction over this action, as Plaintiff presents a diversity question pursuant to Section 1332 of Title 28, seeking redress for their claims against Jermiah and Altar Global, which are residents of North Carolina, and Paul Johnson and his business, Paul T Johnson Ministries, which are residents of Indiana, and the amount in controversy exceeds \$75,000.00.

9. Venue is proper in the Northern District of Texas under 28 U.S.C. § 1391(b)(3) because Plaintiff resides in the Northern District, wherein they have suffered harm due to the defamatory statements made by Defendants.

10. Plaintiffs' claims for declaratory and injunctive relief are brought pursuant to Federal Rules of Civil Procedure 57 and 65, respectively, and the general legal and equitable powers of this Court.

IV. ATTACHED EVIDENCE

Exhibit A: Declaration of Josiah Johnson

A-1: The Alter Global April 30, 2024, Facebook Post.

A-2: "Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ." Post on Paul T. Johnson Ministries (Original).

A-3: "Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ." Post on Paul T. Johnson Ministries (Amended).

A-4: Demand Letter to Jeremiah Johnson on November 07, 2024.

V. FACTS

A. Josiah confronts Jeremiah over false prophecies and plagiarism.

11. In 2019 Josiah privately confronted his brother Jeremiah about his plagiarism and fabrication of prophecies that Jeremiah attributed to divine oracles, though he had actually taken such phrases and ideas from others. Examples include Jeremiah's brief step back from his ministry after his prophecy regarding the reelection of Donald Trump in 2020 did not occur.¹ A second example was Jeremiah's decision to misattribute the phrase "a boom in the upper room" as a divine revelation from two angels, though Josiah coined the phrase and Jeremiah simple decided to misuse it for his own purposes.²

12. Around this same time period, other charismatic leaders, including Robert Gladstone, called out Jeremiah for his claimed dreams and interpretation wherein he claimed the crown of leadership in the charismatic church after leader Mike Bickle was exposed, and Jeremiah thought he could claim the mantle as his own.³

13. To address Jeremiah's pattern of plagiarism⁴ and false prophesy, Josiah publicly called Jeremiah out for the fabricated dream and prophecy on Facebook.

¹ <u>https://www.newsweek.com/evangelical-prophet-ends-ministry-after-apologizing-predicting-trumps-re-election-1574888</u>.

 $^{^{2}}$ Jeremiah has reported the revelation in multiple contradictory stories, both as coming during a dream, and also as coming from two angels directly.

³ <u>https://robertgladstone.org/index.php/2024/03/20/den-of-thieves-part-2/.</u>

⁴ <u>https://protestia.com/2020/09/21/charismatic-prophet-jeremiah-johnson-plagiarizes-j-d-halls-imprecatory-post-against-ruth-bader-ginsberg/</u> (all URLs last assessed December 27, 2024.)

14. The incident was ultimately reported by the Washington Post, leading to publication of an article thereon on August 10, 2024.⁵ Other prominent news outlets

picked up and amplified the story.⁶

B. Jeremiah defends with false defamation.

15. In response, Jeremiah conspired with and used his other brother, Paul, as a proxy, when in April of 2024, Paul published an article titled "Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ."⁷ ("Defamatory Article"), created after Paul contacted dozens of individuals to collect critical statements about Jeremiah, and then posted the same article on his Facebook page.

16. Jeremiah knowingly cooperated with Paul to publish the false and Defamatory Article so that Jeremiah could use it to discredit Josiah and his accusations of plagiarism by disseminating it among

3:30 € 6:04 C The Altar Global Posts About Photos Videos Events The Altar Global Apr 30 · ☉

I have chosen silence over the last several months as I have been publicly slandered, threatened, and falsely accused online by my older brother Josiah and several others. Privately, this has been going on for more than 15 years. I have always believed that God is my defender and will reveal the truth in His timing.

It is with great sadness that I share this document that has been published today from a team of leaders in the body of Christ. It details their tragic first hand stories from over a decade to the present and I trust it will bring clarity and answers to so many questions that I have been asked both privately and publicly and chosen to remain silent on. May the record speak for itself.

With great sorrow,

Jeremiah Johnson



Exhibit A-1

Jeremiah's followers as shown to the right, labeled Exhibit A-1.

⁵ <u>https://www.washingtonpost.com/nation/interactive/2024/trump-prophecy-josiah-jeremiah-johnson-alabama/?itid=hp-top-table-main_p001_f007</u>.

 ⁶ https://www.newsweek.com/jeremiah-josiah-johnson-pro-trump-fake-prophecies-1937428.
 ⁷ https://web.archive.org/web/20241217204540/https://www.paultjohnson.org/statement.

17. In the Defamatory Article, Paul commented on Josiah Johnson's ministerial professionalism by disparaging his character and accused him of being unfit to participate in ministry on account of "his lack of Christlike character, volatile history, and the absence of any real accountability for his life and ministry."

18. Paul further accused him by writing, "Josiah's established and repeated pattern of manipulation, intimidation, jealousy, slander, anger, lying, and division is seriously concerning." Paul went on to imply that Josiah is a source of dissension and difficulties and a cause of division by writing:

Romans 16:17-18 (AMPC) instructs us to "be on your guard concerning those who create dissensions and difficulties and cause divisions, in opposition to the doctrine which you have been taught. [I warn you to turn aside from them, to] avoid them. For such persons do not serve our Lord Christ but their own appetites and base desires, and by ingratiating and flattering speech, they beguile the hearts of the unsuspecting and simpleminded.⁸

19. Paul explicitly linked this passage to both Josiah and Jennifer writing:

"Josiah, along with his wife, Jennifer Johnson, have deceived and divided many innocent and unsuspecting people and families by their flattering speech and cunning behavior. Full of envy and malice, Josiah has appointed himself as the chief prosecutor of the church."

20. In sum, at Jeremiah's behest and with Jeremiah's cooperation and participation, Paul, and subsequently Jeremiah accused both Josiah and Jennifer of misconduct in the course of their ministry.

⁸ https://web.archive.org/web/20241217204540/https://www.paultjohnson.org/statement.

21. The only evidence that Paul proffered to support his defamation of Josiah and Jennifer was a truncated text exchange concerning the decision to publish information regarding Jeremiah and Josiah's father's cancer diagnosis to the public via social media, wherein Josiah used profanity regarding the tense family dispute. However, nothing in that exchange indicated that either Josiah or Jennifer was a source of dissension, difficulty, or division, nor that they oppose Church teaching regarding or in relation to any specific church or the Church generally. At most, the exchange shows intemperate word choice in a private family dispute and does not substantiate the alleged victimization of innocent congregants by Josiah or Jennifer in a ministerial capacity. Critically, Jennifer is not a party to the discussion at all, yet she is in no way exempt from Jeremiah's defamatory censure.

22. Paul further alleges, and Jeremiah amplified on social media, that "I spoke with six additional pastors (all in different states) who readily confirmed they have also witnessed unhealthy and ungodly behavior in Josiah and Jenn, and they encouraged me in compiling this document so unsuspecting people could be warned to avoid them." (Exhibit A-2.)

23. Though Paul solicited this information from a variety of people concerning Josiah and Jennifer under the false pretense that he would use it for private correction rather than public castigation, the information was used very publicly. 24. After Jeremiah republished the false statements, one pastor, Greg Crawford, retracted his statements concerning the Johnsons. To avoid scrutiny, Paul quietly edited the Defamatory Article to remove his information but left no clarification or correction. (See Exhibits A-2 and A-3.)

25. Paul also falsely claimed in the Defamatory Article, "none of these people personally know each other and they have not spoken to each other in regard to this document," which Jeremiah repeated by his reproduction. However, many of the individuals named in the Defamatory Article know each other. For example, Elizabeth Heller moved to Alabama from Riley Shelton's Church. Similarly, Greg Crawford and Alexa Paulsen not only know each other, they were introduced to each other by Josiah. Alexa knows the elders at Heart of the Father where she was formerly a member.⁹ This misrepresentation demonstrates the ease by which Jeremiah and Paul cavalierly lie to make their narrative more credible.

26. Paul asserted in his writing the following summary of accusations:

[The] list of godly character qualifications in 1 Timothy 3:1-7 and Titus 1:5-9 clearly disqualifies Josiah from being a leader in the body of Christ. His life and character are far from being "above reproach", his home is managed poorly, his children are completely out of control, his public reputation is marred, he often lacks any self-control, and he is entirely pugnacious, a bully and violent aggressor prone to quarrel and quick to fight.

⁹ In June of 2012, Josiah and Jeniffer married at Heart of the Father Ministries Church ("HOTFM") in Florida. HOTFM Elder Barry Nichols presided. Many of the actors involved in this dispute have HOTFM as a common nucleus of activity.

Jeremiah knows full well that Josiah's children are no more or less well behaved than most and Jeremiah further knows that Josiah is not violent and does not engage in "fights" or other physical confrontations.

A. False Assertions Regarding Elizabeth Heller

Regarding the statements Jeremiah chose to publish, Jeremiah knowingly 27. omitted the materially relevant context that sheds exculpatory light on Josiah and Jennifer's conduct in his Defamatory Article. These omissions are most egregious in Jeremiah's leading statement from Elizabeth Heller where she accuses Josiah and Jennifer of attempting to destroy her marriage but neglects to mention that her husband had been physically and spiritually abusive to her and their children for years and routinely accused her of "worshiping Satan." Jeremiah also omitted the fact that Elizabeth Heller called the police and sought a protective order against her husband, for the third time, on police advice, not on the advice of Jennifer or Josiah. The facts of these events differ from Defendants' rendition. After Elizabeth 28. had come to the Johnsons' home, Michael and several other couples joined the meeting. That meeting did not end well, and Elizabeth stayed at the Johnsons' home that night. Elizabeth was leery about attending church the next morning because she feared that Michael would come to the church and make a scene or pretend nothing happened and expect her to go home with him. Josiah told Elizabeth that he would text Michael and just be clear with him that he could not come that morning.

29. After realizing that Elizabeth would not come to church, Michael called law enforcement and asked for a welfare check to show his power and embarrass his wife. But if Elizabeth wanted to go home, she could have done so then.

30. Elizabeth went out and the police talked with her. She was crying and told the police officer that she did not feel safe and did not want to go home. Michael brought Elizabeth's mom so that her mother could drive his car and he could take Elizabeth's car from her that morning. The officer present at the scene made Michael give his wife the car seats and diapers, but he still took the car.

31. The officer advised against a restraining order but a protection from abuse order. Plaintiffs and Elizabeth went to a police station and requested an escort to his house, allowing her to retrieve some necessaries from her home.

32. None of this relevant context was included in the Defamatory Article.

B. False Assertions Regarding Barry Nichols, David Vespa, Brandon Jenkins, the Elders of Heart of the Father Ministry in Lakeland, FL.

33. The Defamatory Article purports to describe events concerning the elders of Heart of the Father Ministry ("HOFM") and their experience with Josiah. However, Jeremiah knows that these allegations are false, and these individuals have observed Jeremiah lying on multiple occasions and discussed this shortcoming with Paul.

34. The elders of HOFM have covered for Jeremiah for years. E.g., in 2016, Jeremiah "prophesied" that Paul would take the pastor position of HOFM, which was sheer fabrication because Jeremiah wanted to travel as a prophet, leaving the

church's leadership to someone else. The elders knew of this failed prophecy, which Paul identified and exposed as false. The elders of HOFM were central to this discussion, which ruptured the relationship between Jeremiah and Paul for years.

35. Jeremiah is also aware of the omitted fact that these same elders refused to allow Jeremiah to attend Heart of the Father Ministry for a period of three years over the revelation of Jeremiah's false prophecy.

36. Due to the dependence of the elders of the HOFM on Jeremiah's continued influence, they have supported the concocted events described in the Defamatory Article, though many of the allegations are exaggerated for effect.

C. False Assertions Regarding Riley Shelton, Senior Pastor of The Way Church in Hartwell Georgia

37. The allegations raised by Riley Shelton revolve around Josiah and Jennifer Johnson's introduction of Elijah McCurley to Jennifer's sister Allison and the subsequent marriage between the two of them. Shelton lamented the severance of the relationship between Elijah and his mother and sister over the marriage, however, Elijah is happily married, and Josiah and Jennifer cannot be credibly accused of any sort of ministerial misconduct for setting up a relationship that has proven to be enduring and successful.

38. Elijah and Allison have made a public video rebutting Shelton's false narrative, yet oth Jeremiah and Paul have refused to acknowledge the McCurleys' efforts to correct the record or communicate with them and get their side of the story.

D. False Assertions Regarding Joe Sweet, Senior Pastor at Shekinah Worship Center Lancaster, California.

39. The Defamatory Article recounts a statement by Joe Sweet, but the statement omitted the crux of the dispute between Josiah and Sweet.

40. Sweet never mentions that on Josiah's first day on the job, Sweet took Josiah into his office and bluntly stated that his wife Melinda was the "Number 1 enemy of his ministry" and a "true Jezabel that he couldn't trust."

41. Sweet failed to reveal the disagreement between Sweet and his wife. Specifically, Sweet allowed a pedophile, his oldest son, Elijah Sweet, to attend church and date a member of the congregation with children, over the objections of his wife and the horror of Josiah and Jennifer.

42. Thus, to the extent Josiah and Jennifer raised any dissension, it was in an effort to protect children and appalled by Sweet's extraordinary recklessness and cavalier attitude toward allowing a pedophile free reign within his congregation.

E. False Assertions Regarding Alexa Paulsen, Director of Worship Yasha Ministry in Sioux City, Iowa.

43. Alexa Paulsen's statement includes multiple falsehoods, including her accusation that Josiah called Paulsen's mother, Shawn Lohry, the Jezebel of Souix City, and Josiah said he was sent by God to end Yasha Ministry, among others.

44. She also knows several of the elders at HOTFM, contrary to Jeremiah's statement that these are all independent tales.

45. Plaintiffs believe that Alexa cooperated with Paul to write the Defamatory Article because they have known each other since attending college and church together, and Alexa benefits pleasing Paul and Jeremiah and receiving panache in charismatic circles.

VI. DAMAGES

46. When the Defamatory Article was published, Josiah lived in a small city of about 8,000, and Josiah lost his job wherein he was earning ~\$6,000.00 per month, an annual loss of \$72,000.00, which he expected to be able to perform indefinitely.
47. The allegations caused Jennifer to lose her real estate business in Orange Beach, Alabama, because her supervisor ceased all his previous support, which cratered her income, at an estimated annual loss of \$25,000.00.

48. Additionally, Josiah and Jennifer suffered public humiliation and attacks on social media, with neighbors told of the allegations contained in the Defamatory Article. Josiah and Jennifer were told to move by multiple people.

49. The Defamatory Article isolated Josiah and Jennifer, and they spent \$16,000.00 moving from Orange Beach, Alabama to Texas, where the ongoing defamation continues to haunt their reputation, as they have struggled to obtain employment and their options for positions in ministry have been curtailed.

VII. CONDITIONS PRECEDENT

50. Plaintiffs have complied with all conditions precedent to successfully prosecute their claims against Defendant including sending a written letter demanding retraction to the defendants pursuant to Tex. Civ. Prac. Rem Sec. 73.055, that has gone unanswered.

VIII. CLAIMS

A. Defamation Per Se and Per Quod – Direct, by Implication, and Innuendo.

51. Defamation is the invasion of a person's interest in her reputation and good name. *Hancock v. Variyam*, 400 S.W.3d 59, 63 (Tex. 2013). The elements of defamation include: (1) the publication of a false statement of fact to a third party; (2) that was defamatory concerning the plaintiff; (3) with the requisite degree of fault; and (4) damages, in some cases. *In re Lipsky*, 460 S.W.3d 579, 593 (Tex. 2015). Negligence is sufficient to create liability for private figures. *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 570 (Tex. 1998). Negligence is established upon a showing that the publisher knew or should have known that the defamatory statement was false. *HDG, Ltd. v. Blaschke*, 2020 WL 1809140 (Tex. App.— Houston [14th Dist.] Apr. 9, 2020).

52. Jeremiah Johnson and Paul Johnson, and their ministries, The Altar Global and Paul T. Johnson Ministries, respectively, are liable to Josiah and Jennifer for the Defamatory Article.

53. Additionally, Jeremiah is liable for his republishing of the Defamatory Article, including Facebook post which he signed while posting, on April 30, 2024 (Exhibit A-1), which accused Josiah of publicly slandering, threatening, and falsely accusing him, and linked to the Josiah Johnson: Warning the Body of Christ About Josiah Johnson Post. (Exhibit A-2.)

54. Jeremiah and Paul's allegations that Josiah had slandered, threatened, and falsely accused him are false.

55. Jeremiah's knowingly endorsed and spread the false and defamatory allegations contained in Exhibit A-2 that Paul created and disseminated including:

- a) Paul alleged that he collected statements from six pastors in different states who claimed to have witnessed unhealthy and ungodly behavior in Josiah and Jenn. While all of these statements are false, at least one of the pastors, Greg Crawford, has retracted his comments, compelling stealth redactions of the defamatory publications in the Defamatory Article that are nowhere noted therein, which went to Josiah's suitability to practice his ministry.
- b) The assertion via Elizabeth Heller that Josiah improperly attempted to use his pastoral role to destroy her marriage. This statement is defamatory in that it goes to Josiah's suitability to practice his ministerial profession and the narrative omitted materially relevant facts regarding Elizabeth Heller's husband physical and spiritual abuse of his wife and children over years,

resulting in his wife's call for police report and multiple protection orders. During the period when Josiah was counseling Elizabeth, she had called the police, who advised a protection order.

56. Jeremiah's post on Facebook as The Altar Global on April 30, 2024 (Exhibit A-1), directly defamed Josiah by accusing him of slandering, threatening, and falsely accusing him, and linked to the Defamatory Article. (Exh. A-2.)

57. Similarly, the Defamatory Article named Jennifer as a deceiver and divider of the church, 13 times describing her as a partner working with Josiah to damage church leadership, e.g., "We have also observed how Josiah and Jennifer actually work 'behind the scenes' to gather any kind of information that could be damaging or discrediting to leadership."

58. As the Defamatory Article was ostensibly written and published by Jeremiah and republished and distributed by Paul, and both used their business ministries in the process, all of the defendants are liable to both Josiah and Jennifer for their per se defamation of their work as ministers, directly, by implication, and by innuendo.

B. Damages for Defamation

59. There are three types of damages that may be at issue in defamation per se proceedings: (1) nominal damages; (2) actual or compensatory damages; and (3) exemplary damages. Plaintiffs can seek general damages that includes damages for

loss of reputation and mental anguish. *Miranda v. Byles*, 390 S.W.3d 543, 555–556 (Tex. App.—Houston [1st Dist.] 2012, pet. denied).

60. Given the perennial nature of Jeremiah's campaign of defamation against Plaintiff and the per se nature of Jeremiah's false statements, they are entitled to damages for loss of reputation, mental anguish, compensatory damages, and exemplary damages.

61. Josiah lost \$6,000.00 per month in serving income totaling \$72,000.00 over the course of the year, for which Josiah is seeking three years of lost income.

62. Jennifer was forced to abandon her real estate business in Orange Beach Alabama, suffering a loss of more than \$25,000.00 annually, for which she seeks three years of lost income.

63. Because Jeremiah and Paul Johnson acted with malice, knowing that the Defamatory Article is untrue in multiple places and exaggerated in others to damage the reputation of Plaintiffs, Plaintiffs seek exemplary damages of \$1,000,000.

64. Additionally, the Plaintiffs spent \$16,000.00 moving from Orange Beach Alabama to Texas, where the ongoing defamation still arises in conversation and continues to haunt their reputation.

IX. ATTORNEY FEES

65. Plaintiff seeks attorney's fees in equity. *Knebel v. Capital Nat'l Bank*, 518 S.W.2d 795, 799-801 (Tex. 1974), citing *Hall v. Cole*, 93 S. Ct. 1943 (1973).

X. INJUNCTIVE RELIEF

66. Plaintiff asks the Court to order Defendants to remove the defamatory statements at issue from all websites and take reasonable efforts to eliminate third-party re-publications of their statements.

PRAYER

WHEREFORE, Plaintiffs respectfully pray that Defendant be cited to appear

and answer, and that Plaintiff be granted the following relief:

- a) Judgment against Defendants for economic damages exceeding \$1,000,000 pursuant to claims of defamation, business disparagement, and associated economic harms, including lost income, and exemplary damages;
- b) Prejudgment and post judgment interest as provided by law;
- c) Attorney's fees;
- d) An injunction compelling Defendant to remove all defamatory statements from websites and request third-party re-publishers to do the same;
- e) Court costs;
- f) All other relief to which Plaintiff may be justly entitled in both law and equity.

Respectfully submitted,

<u>/s/ Warren V. Norred</u> Warren V. Norred, Texas Bar Number 24045094, warren@norredlaw.com Norred Law, PLLC; 515 E. Border St., Arlington, Texas 76010 P. 817-704-3984 *Attorney for Plaintiffs*

EXHIBIT A

Declaration of Josiah Johnson

My name is Josiah Johnson, my date of birth is October 09, 1986; and my address is 3417 Wendell Drive, North Richland Hills, Texas, US. I declare under penalty of perjury under the laws of the United States of America that the factual allegations in the above complaint, paragraphs 11-45, are true and correct.

Additionally, I declare that the exhibits attached are the true and accurate documents that they purport to be, which I personally collected, including:

A-1: The Alter Global April 30, 2024, Facebook Post.

A-2: "Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ." Post on Paul T. Johnson Ministries (Original).

A-3: "Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ." Post on Paul T. Johnson Ministries (Amended).

A-4: Demand Letter to Jeremiah Johnson on November 07, 2024

Executed in Tarrant County, Texas on December 29, 2024,

Josiah/Johnson

The Altar Global's Post



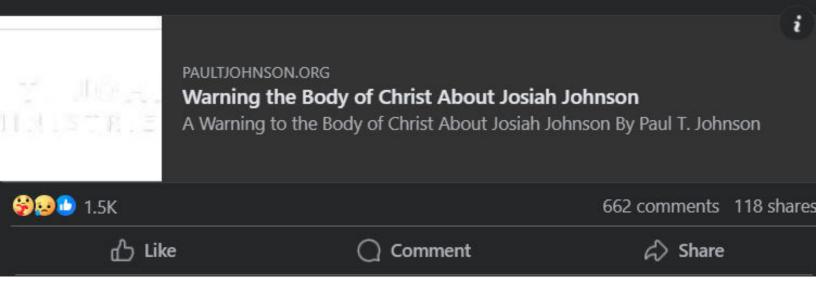
The Altar Global · Follow April 30 · 🕲

I have chosen silence over the last several months as I have been publicly slandered, threatened, and falsely accused online by my older brother Josiah and several others. Privately, this has been going on for more than 15 years. I have always believed that God is my defender and will reveal the truth in His timing.

It is with great sadness that I share this document that has been published today from a team of leaders in the body of Christ. It details their tragic first hand stories from over a decade to the present and I trust it will bring clarity and answers to so many questions that I have been asked both privately and publicly and chosen to remain silent on. May the record speak for itself.

With great sorrow,

Jeremiah Johnson



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Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ

By Paul T. Johnson

For over a decade, I have carefully observed Josiah Johnson's life and ministry and felt deeply grieved at the widespread destruction and division he has caused throughout the body of Christ. This document explicitly, yet not exhaustively, details some of that destruction and division and serves as a warning to the body of Christ to *mark Josiah Johnson for division and avoid him completely* until he repents and is properly restored to the Lord's body by capable and qualified leaders (Romans 16:17-18, Galatians 6:1, Titus 3:10-11).

In February of 2024, I confronted Josiah in two separate conversations (one in person and one via phone) about his lack of Christlike character, volatile history, and the absence of any real accountability for his life and ministry. Josiah's established and repeated pattern of manipulation, intimidation, jealousy, slander, anger, lying, and division is seriously concerning.

Romans 16:17-18 (AMPC) instructs us to "be on your guard concerning those who create dissensions and difficulties and cause divisions, in

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 22 of 88 Exhibit A22 opposition to the doctrine which you have been taught. [I warn you to turn aside from them, to] avoid them. For such persons do not serve our Lord Christ but their own appetites and base desires, and by ingratiating and flattering speech, they beguile the hearts of the unsuspecting and simpleminded."

Josiah, along with his wife, Jennifer Johnson, have deceived and divided many innocent and unsuspecting people and families by their flattering speech and cunning behavior. Full of envy and malice, Josiah has appointed himself as the chief prosecutor of the church.

Although he has never been stable or consistent enough to lead any legitimate church or ministry for more than a few months, he boldly lectures others on what a healthy ministry should look like. Any person who lovingly challenges Josiah and objects to his behavior or dares to try and bring him into order is accused of personal compromise, hidden sin, or worse.

As clear evidence of Josiah's corrupt character, I have included screenshots from a group text message between me, Josiah, and another one of our brothers, Jeremiah. These texts from June 2, 2022, occurred at a very painful intersection for our family as our father was diagnosed with terminal cancer.

With full knowledge and permission from our father, I shared his situation online to ask the body of Christ to pray for him. The text messages serve as a small but accurate window into Josiah's pattern of threatening and intimidating people:

(Note - Jeremiah's text response to Josiah is in blue.)

Document 1

<	2 People >	
	Paul Johnson	HA
PJ	I asked for Pops and Melissa's permission before posting publicly. If that is going to be your attitude, please don't show up tomorrow. Your attitude is sinful so leave it in TN or don't show up.	
	Josiah Johnson	
	Go Fuck your self	
	You can't do shit about it	
	And you won't	
	You are both Pussys and I'm looking forward to tomorrow	
	Sinful attitude	
	Your hilarious Paul	
	Just I'm case you two boneheads forgot my	
	He was my father before he was yours	S
	And you don't get to cut me out or keep me from anything	
JJ	Any attempt to do so will be met with things you ain't ready for	
	Josiah Johnson	
L	Almost	
L	It's Jerry I'm coming for	
	Okay. That's three direct threats Josiah. If you make one more- I' calling the police and I'm not kid You are not gonna bully and act when dad is on his death bed. Yo need to cool down.	m ding. crazy
	You are an asshole Jerry and I hate	
	you with everything I have dude	

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 24 of 88 Exhibit Ac-2 In an effort to adequately and effectively warn the body of Christ according to Romans 16:17-18 about their divisive and destructive behavior now spanning over a decade, I have compiled the following statements below from pastors and people who have each experienced firsthand Josiah and Jennifer's venom and discord.

I also spoke with six additional pastors (all in different states) who readily confirmed they have also witnessed unhealthy and ungodly behavior in Josiah and Jenn and they encouraged me in compiling this document so unsuspecting people could be *warned to avoid them*.

Please note that none of these people personally know each other and they have not spoken to each other in regards to this document.

Below are their statements concerning Josiah and Jennifer Johnson:

Elizabeth Heller Orange Beach, Alabama

On Friday March 22, 2024, I texted Jenn Johnson a message about my marriage asking for prayer for my husband, Michael. Around 11:00am that morning, Jenn and Josiah called me and told me to get the kids and come over to their house immediately.

They told me not to answer any calls from Michael and to just come over. I went to their house where they informed me that they had called for a church meeting in their home at 6pm and told Michael to be there. They Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 25 of 88 Exhibit Ac2 had me turn off my phone at that point. What I didn't know is that instead of telling Michael there was a meeting, Josiah had called and threatened him saying if he ever wanted to see his wife and kids again to be at their house at 6pm.

Before the meeting started, I said to Josiah that I pray that God would work and move in my husband so that our marriage would be better. Josiah's response to that was, "That's not the way this thing is going to go down."

The meeting started with a lot of yelling on Josiah's part. I did very little talking that night. It was mostly Jenn, Josiah, and other members of their "church" leading the conversation. Jenn wrote on a piece of paper and gave it to me telling me to tell Michael that I was leaving him regardless of what happens tonight. So, whether he repents or apologizes to me, it wouldn't matter and that I still needed to leave him.

It was *never* my intention or plan to leave my husband. I wanted someone to talk to about my marriage, pray with me, and help us work on our marriage. But they were not interested in helping me or us at all.

Jennifer told my oldest daughter not to even go near her dad because he was Jezebel. Josiah told Michael, "You need to quit your job today or you will lose your wife and kids right now." Josiah was angry and when Michael refused to quit his job and walked over to me and our two daughters and asked if they were ready to go home, Jennifer yelled across the room, "What are you doing?" Michael replied, "I'm talking to my kids." Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 26 of 88 Exhibit Acc Jennifer then rushed over to where we were seated and said, "No, you're not! Get out of my house right now!" Then Josiah and another church member ran over and pushed Michael up against the wall. Then they grabbed his arms and forcefully pushed him out of the front door. After Michael was gone, I heard Josiah and Stuart talking about guns. Stuart said, "I brought mine if I need it."

After church on Sunday, Jenn and Josiah told me that I needed to file a PFA (Protection From Abuse) order against Michael even though there was no legitimate reason to. They kept insisting until I finally went on Tuesday, March 26, 2024 to file it. I went inside, got the paperwork, sat down to fill it out, and couldn't do it. So, I took the PFA paperwork outside to the car and sat and cried because I did not want to fill it out. I told Jenn I couldn't do it, that I could not lie. She told me I had to do it or Michael was going to destroy me and take the kids from me. She said, "One way or another you're going to court."

The temporary PFA was put into place and Jenn and Josiah wanted Michael to violate it and go to jail. They continually wanted me to press charges on him to try to get him in trouble. They also told me that I needed to put a post on Facebook to "claim the narrative" as they say. I did not want to do that either, yet once again they insisted and even helped me write it.

Michael and I went to court on April 11, 2024 for the PFA and custody. The PFA was dropped. Michael came to pick up the kids as the judge granted and we ended up talking for about an hour. Michael sincerely and whole heartedly apologized for issues in our marriage and wanted to reconcile Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 27 of 88 Exhibit A-2 and make things right. He hugged me and cried, begging for me to forgive him. I told him that I forgave him.

I texted Jenn on Facebook that morning telling her that I did not want a divorce. I told her that Michael set up marriage counseling for us if I was willing to go. I told her I felt hope for my marriage. I told her I wanted to go home.

She replied with a very long, unhappy message stating that "Jesus Himself could not change Michael" so how could a counselor. Jenn said, "You will have to give an account to the Lord if you go back to him."

On Friday night, I called Michael when I felt the Holy Spirit showing me it's time to go home. Michael told me he would come and get me and our belongings right away and came to pick us up around 3:30am. Jenn and Josiah were very upset and told the rest of the "church family" to have nothing to do with me. This happens very frequently with Josiah and Jenn if you don't "submit" to their leadership and do what they say.

The following day another family in the home packed up their stuff and left in the middle of the night. They called me once they arrived back in their home state to tell me that they had left as well and that Jenn and Josiah were very upset with them. They left out of fear in the middle of the night as well. I was happy to hear they had also left and returned home. Jenn and Josiah were so mad that we all left that they bashed us to the rest of the church on the group chat. Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 28 of 88 Exhibit Ac2 I am thankful that we have all left but there is still major fear of backlash and retaliation for us leaving. Josiah and Jenn are not quick to give up their control over people. We are scared that they are going to come to our home to cause problems but we have already told them to leave us alone so we pray that they will do just that. We also pray that they will not do this to any other families moving forward. It's been the worst month of our lives because of these people.

I also want everyone to beware of giving to their church. Josiah and Jenn manipulated me and my husband to give to the church by taking us out to eat and pressuring us to "be faithful to the Lord". Josiah said things like, "If you don't give, the Lord will take your whole family down." He uses the Lord to manipulate and condemn you for his benefit. After we agreed to give a large sum of money to the church, he then directed us to write the check out to him personally so we did. It was a big red flag that right after giving him our money, he stopped calling and pressuring us because they got what they really wanted – money.

Barry Nichols, David Vespa, Brandon Jenkins | Elders Heart of the Father Ministry Lakeland, Florida

Josiah Johnson has attended Heart of the Father Ministry during two different time periods. He was in and out during the early days of 2010 -2013, and then again from October 2021 - April 2022. Both of these seasons with Josiah have been difficult and destructive. Prior to their most recent time here, Josiah and Jennifer reached out to us desiring to come be a part of our community. We agreed as elders to receive them into our community and give them one more opportunity to get whole and healthy, given their difficult and destructive history with us. We met with them upon their arrival and told them we don't want any of the drama or destructive behavior they displayed in times past. They agreed.

Since 2010, our experience and observation has been that Josiah has been a person who would go through dramatic emotional and spiritual cycles. At times he seemed to be fully engaged in relationship with the Lord and then he would become offended, highly critical and angry, obsessing on the perceived faults of others, especially related to his brother Jeremiah and church leadership in general. Next, he would withdraw, and often, backslide into a season of depression, worldliness and sin.

We have observed these cycles multiple times while Josiah has been here at Heart of the Father; and from our perspective, those cycles continue to occur. We have observed Josiah's explosive anger on display a number of times. So, it is not a surprise to us, that less than a year ago, Josiah publicly confessed to using his anger to manipulate even those closest to him.

"Do not make friends with a person given to anger, or go with a hot-tempered person, or you will learn his ways and find a snare for yourself." - Proverbs 22:24-25 Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 30 of 88 Exhibit Ac2 In conjunction with his destructive anger, during his dark cycles, Josiah also freely spews out attacking, threatening, demeaning and insulting language. The most recent in-person incidents towards us were in early 2022 when he stood up in a restaurant, shook his finger angrily, and shouted "You're a coward! You're a coward!"

He also hurled other such words and texts at us, that we were "liars", "selfrighteous", and that we had "made truces with Jezebel and Ahab, are double minded and double tongued, are guilty of having blood on our hands, are filled with ambition, are passive men, are unwilling to repent, have become complicit to wickedness, hypocrisy, delusion and duplicity." We have witnessed these kinds of verbal attacks multiple times, including recently in texts. This is Josiah's way.

"I wrote to you not to associate with any so-called brother if he is a sexually immoral person, or a greedy person, or an idolater, or is **verbally abusive**, or habitually drunk, or a swindler - not even to eat with such a person." - 1 Corinthians 5:11

Ever since we have known Josiah and the Johnson family, there has always been a level of jealousy that existed in Josiah towards his brother Jeremiah. At times, the jealousy would remain under the surface and then the cycle would shift to outright animosity and verbal and emotional attacks. From our perspective, this cycle of jealousy continues until this day.

During a meeting with Josiah in early 2022, Barry told Josiah that he didn't believe that Josiah's anger was really against Jeremiah or us, but actually

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 31 of 88 Exhibit A-2 against God. That Josiah was angry with God for not taking out Jeremiah for him. In an honest moment Josiah answered, "You might be right."

We have also observed how Josiah and Jennifer actually work 'behind the scenes' to gather any kind of information that could be damaging or discrediting to leadership. In the case of Heart of the Father, it didn't take long before Josiah and Jenn became disgruntled and frustrated because in their minds our church lacked vision and a prophetic voice.

They both began having conversations about this with individuals in the church, including with a trusted leader in our church community. This leader shared with Josiah and Jennifer some general information about how they felt the church was doing and how they had been praying for forward progress and growth in the things they believed God wanted to do. This leader also expressed to Josiah and Jenn that they completely trusted the elders' leadership and ultimately the Lord would have His way.

Shortly after this conversation, Josiah and Jenn shared with the elders that we had people on our leadership team who were disgruntled and struggling because of our poor leadership. After speaking with this leader personally, it became clear that the Johnsons had left out important information and ignored the context and spirit of the leader's words in order to try to build a case for how Josiah and Jenn's leadership was needed in our community!

We also observed this kind of 'web spinning' activity in our last in-person meeting. Since there was obvious relational tension between the elders and the Johnsons and there were clearly divisive forces at work in our Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 32 of 88 Exhibit A-2 church community, the elders called for a meeting with Josiah and Jenn.

After a few weeks of trying to work out schedules, Josiah flatly refused to meet with us. It was discussed early on that perhaps the elders' wives would also attend, but that detail was forgotten because of the length of time it took to schedule the meeting. The meeting occurred on April 10, 2022. Only Jenn came. She said she was expecting the wives to be there as well. We offered to reschedule the meeting. She said that it would be fine to meet without the wives.

Then Jenn offered to open the meeting in prayer, and while we were praying, she secretly slipped her phone under her Bible and began recording the conversation. She never mentioned the recording to us. That is actually a felony under Florida law, and it shows the deceptive means they were willing employ to try to gather any kind of damaging information. After Josiah heard the recording, he sent insulting text messages calling us 'cowards' and 'liars' etc.

"Reject a divisive person after a first and second warning, knowing that such a person has deviated from what is right and is sinning, being self-condemned." -Titus 3:10-11

It is clear to us that Josiah and Jennifer Johnson are unhealthy, divisive and a destructive force in the Body of Christ. They know the correct Christian language and the right face to put on things, so they have skill in manipulation. But from our perspective, they operate out of jealousy and a desire for prominence and recognition and their influence and "ministry" is Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 33 of 88 Exhibit A32 detrimental to the heart and purposes of Jesus in His Church.

Riley Shelton | Senior Pastor The Way Church Hartwell, Georgia

I met Josiah Johnson and his wife Jenn in the fall of 2023 through our Associate Pastor Stuart Graham. Stuart had met Josiah at a mutual friend's wedding several years earlier. He told me that Josiah called him out of the blue one day, several months before, and told him that the Lord had laid him on his heart to call him.

I found out much later that this had grown into a weekly facetime phone call with Stuart and his wife being "mentored" by the Johnsons over a period of 5 months. Stuart approached me one day and told me that Josiah was coming to town to visit them and would I consider allowing him to preach. He was impressed with Josiah's anointing and knowledge of the Word of God and said he would like for our church family to hear him and for my wife and I to meet him.

Because of the timing that I would be recovering from outpatient hernia surgery that week, and because I trusted Stuart, I agreed, but I called Josiah to speak with him first. On the phone Josiah was quite respectful and came across as very skilled in spiritual matters. He respectfully used "Yes Sir, No Sir" and told me that he did not ask to preach but was only coming to visit, but that Stuart and his wife wanted him to, and they also wanted Jenn to Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 34 of 88 Exhibit A32 help lead worship. Our Worship Pastor welcomed Jenn into the worship team that day.

So, we honored our guests when they came, he preached and for the most part what he said that Sunday was ok, but then he began to make some points on how he didn't agree with how the local church should operate. It didn't take long before I discovered he had an agenda, was a master manipulator, and was causing many concerns with his accusations against The Way Church.

Before he left town, Stuart was convinced he was to leave the church, sell his farm and business, leave their dream behind, and join them in Orange Beach, AL. With help of the Grahams, they had already targeted different young adults in our church and had them come to the Graham's home to meet with them, without my knowing, trying to convince them to go to Orange Beach.

The day that Josiah preached, Jenn convinced one young man in our church that the Lord spoke to her and said, "he was to marry her sister." They convinced him to sell his business immediately and move to Orange Beach. So, he got his brother to take over his business, left his dad with debt, and within 3 months he married her sister.

We have known this young man and his family since he was a young boy and his family supported him, loved him, and prayed for him for 14 years through his struggles with drug addiction, relapses, jail, financial disasters, and then finally deliverance and full recovery. He surrendered his life to the Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 35 of 88 Exhibit A32 Lord and was on the right track.

Jenn was overheard at church to say, "As soon as I saw him, I knew he was supposed to go with us." He soon came under Josiah's influence, but the Grahams were also instrumental in convincing him to go. They soon convinced the son to cut all ties with his mom and sister unless they were willing to humble themselves and repent of their sins and that they were not allowed to come to the wedding. He was, however, allowed to text his dad and brother, because they were lost, and it could affect their salvation.

We have known this young man's family for 24 years. They aren't perfect but we have only seen them love, forgive, and support their son. For 14 years this mama cried out, fasted, prayed, warred in the Spirit, lost countless hours of sleep, and even went through cancer battling for her son's life. To see him restored, then to be totally banned from speaking to him or seeing him because they convinced her son that all his issues were her fault. This mom and family were not even allowed to attend his wedding in March 2024. They are all quite hurt, and two of them have been going through counseling.

Just before the wedding, we facilitated a face-to-face meeting at our church between this mom and dad, Josiah and Jenn, and the Grahams, with hopes of them having access to their son. It quickly turned into condemnation, accusation, and word cursing toward the mom.

In hopes that she could see her son, she humbled herself in tears and repentance to them for investigating their ministry and for reaching out to

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 36 of 88 Exhibit A32 his brother Paul's wife in concern for her son. Josiah called her Jezebel and told her he was unmoved by her tears and that her repentance wasn't real. We have never witnessed such un-Christlike spiritual abuse. The meeting was brought to a stop.

Josiah accused me of poor and passive leadership enabling sin. Prior to the meeting, we had learned that they had been communicating with people within the church saying that my wife was a Jezebel, operating in witchcraft, and they word cursed all our leadership and our church family, telling the young people they needed to leave from there or others not to go there. The four of them were confronted about that at the meeting, which quietened things for a moment, but they never repented.

Before leaving, the father, who is unchurched, expressed what he had observed in the meeting, saying that he saw them as hypocrites and not very good Christians. Josiah angrily Bible bashed the father with Scripture telling him he was lost and going to hell, separated from the Father, and it was time to stop hiding behind church hurt. At that point the meeting was immediately adjourned. Nothing was accomplished except a mom and dad leaving criticized, condemned, spiritually abused and humiliated, still not allowed to speak to their son.

Another couple, also members of our church family, were convinced to sell their new home, quit his job, and move to Orange Beach to join Josiah's group. The husband, after being there a few weeks, said he realized that he was caught up in some sort of cult and needed to leave. Josiah and Jenn angrily told him that his wife and children were staying with them and had Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 37 of 88 Exhibit A92 convinced the wife that she needed to divorce him and that he had a demon in him. They have 3 children and one on the way, due this month (April).

He is unable to communicate with them or see them and could not see his daughter on her birthday recently. The wife has cut off all ties to the husband, her mother, and her grandmother until they repent of their sins. I received a call from her upset grandmother telling me she had been forbidden to see her granddaughter and great grandchildren.

We have also come to learn that they are still contacting and trying to lure some folks from our church family to Orange Beach. Most are now aware and alert to it. We know that God loves Josiah and Jenn, has purpose for them in His Kingdom, but they are deceived and on a wrong road. We have forgiven them and pray for them often to have a Damascus Road encounter with the Lord and be restored in a right place with God.

We are also praying daily that the young man from our church will be awakened from the deception and be set free from the stronghold, and reconnected back to his family here in Hartwell, GA. However, he will now always be connected to them because he married Jenn's sister. His family still needs to forgive, need much prayer, and realize that they, also, are now always connected to them by marriage.

We pray that the Graham's will come to understanding that they have been hijacked by deception. They, and all connected to that group, need much prayer.

Joe Sweet | Senior Pastor Shekinah Worship Center Lancaster, California

Josiah Johnson reached out to me in the Spring of 2020 claiming he saw me as a "spiritual father" and that he was willing to be trained. We gave him an opportunity to be mentored. We soon found out that he was very highly skilled at "talking the talk" but very poor at "walking the walk" of a Christian with fruit of the Spirit or godly character.

Looking back, we found out that within the first two weeks of being here, he was already sowing seeds of discord. Over time it became apparent that he was driven by selfish ambition for a pulpit and bitter jealousy of anyone who had a ministry platform.

He began to go to various members of our staff, behind my back, and lay out a case to them that I (the senior pastor) was overworked and not healthy physically and emotionally and that I urgently needed a threemonth sabbatical. Pretending to care, he told them that he knew the Lord had brought him here so that when I was away, he would fill the pulpit and run things. He was urging them, that if they loved me, they would insist I would go away for at least three months or more. He wanted them to "gang up" on me and pressure me to leave on sabbatical.

He took on the role of an Absalom, intentionally asking various staff members behind my back if they had any grievances against me. He told Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 39 of 88 Exhibit A32 them he was sent there to help the church get healthy.

These things were reported to me by people that had been with our ministry for over twenty years. These are people that I know, love, and trust. They were very concerned about his behavior. Others were confused because Josiah put on such an air of sincere caring.

Others in the body told me that he would reach out to them to have lunch or dinner with them. As soon as they sat down, they reported that Josiah would begin to berate and tear me down and explain that he was there to help the church.

I personally caught him lying to me more than once. I finally sat him down to talk to him about his negative attitudes and poor work habits. He became angry and defensive, then went on the attack and began railing accusations against me. He then began yelling at me and "prophesied" that I was "sitting on a railroad track and a bullet train of God's judgment was speeding toward me." As he was verbally abusing me in the name of "prophetic ministry" he implied that I could be killed by God.

Needless to say, he was relieved of his employment that day. I had to meet him at the church office a few hours later so he could get his belongings out of the office. He and his wife, Jennifer, stood in the church office and yelling loudly and angrily, he pointed his finger at me saying, "You have more demons in you than any man I have ever met. You are coming down! This church is coming down!" Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 40 of 88 Exhibit A42 After the board had agreed to fire Josiah for his incompetence, discord, dishonesty, and division, many testimonies surfaced of how he had been sowing discord and division in the body, hoping that he could take over the pulpit.

A dear elderly saint who has been a part of our church for 25+ years had been renting part of her home to Josiah and his family. She told me that when Josiah was relieved of his job at the church, he told her "My mission from the Lord is to bring Joe Sweet down." She also told me that the entire time his family stayed at her house, there was discord and no peace and that his children were "out of control." Hearing him say what he did, she asked him to move out asap. Our senior worship leader said that Josiah came to her and said "I want you to know that you and all the worship team mean nothing to Joe Sweet." He tried to encourage them to leave the church and follow him in his new "church plant" here in town. Of course, they saw through his wickedness and didn't respond.

The Sunday after Josiah was fired, he came back to church with a few of his "friends." When he came to Lancaster, he asked a couple of his friends to move here with him. They sat in the back of the church, and in the middle of the message he jumped up, interrupted the service and began loudly screaming railing accusations against me. I calmly asked him to stop. He ignored it and continued screaming.

Ushers and security team tried to escort him out of the building. He became physical and the sheriff had to be called. Once he was outside, he remained in the parking lot with his wife and two children. When service Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 41 of 88 Exhibit A+2 was over, he began making a scene and yelling at all the people to not listen to me or follow me.

While he and his wife were doing this, his two small children were unattended and one of them ran out into the busy four-lane street in front of the church. Neither Josiah nor his wife knew this as they were not taking care of their children. My daughter-in-law ran out into the street to get their son out of harm's way.

We ended up having a restraining order preventing Josiah from coming back to harass church members. During the time that he was actively sowing discord against me, he was able to draw about five people to follow him to his new "church plant." Josiah had a copy of the church phone directory that he obtained earlier from the church office. Numerous people in our body were called by him as he tried to recruit them to leave our church and go with him to his new "home church" plant.

The week after he left, he began sending profane, insulting, and defaming texts daily to my wife. She ended up blocking his number to stop the harassment.

His "church" plant fizzled out after about three months and he packed up and left town. Several months after that, the wife of one of the couples that had been duped by him and been part of his "home church" plant came to me to apologize. She said, "We were deceived by him." She went on to say how, over time they began to see his true nature. She said they felt used by him, misled, hurt, and disillusioned. There is much more that could be said about his ungodly, dishonest and divisive behavior. Following is a quote from the Shekinah Worship Board meeting in which Josiah was fired.

A Resolution of the Board of Directors of Shekinah Worship Center:

"The undersigned Board of Directors, after discussion, have unanimously agreed to release Josiah Johnson from employment at Shekinah Worship Center effective immediately due to his grossly poor work habits, dishonesty, divisiveness, contempt and malice." (July 28, 2020)

Greg Crawford | Founder The Base Des Moines, Iowa

I first met Josiah Johnson at Yasha Ministry in Sioux City, Iowa in 2014. After ministering at a conference there, Josiah and Jenn came to our house and stayed for about 10 days shortly afterward. He told me he was contemplating moving on from the house of prayer as he didn't feel it was a good fit for him.

During the time of their stay with us, my wife and I began to press him about his parenting skills and helping his wife with a young child. He was open to input. I had him speak at the ministry and my people felt very challenged by him. We had moved to the state capital and about 25 young Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 43 of 88 Exhibit Ar? adults moved with us about 4 years prior to this time. Many of the young people eventually moved on which discouraged those who remained.

Josiah's coming seemed to refire again those who remained and we heard them say, "We've got to get our zeal back." We saw his move as the catalyst to help us transition. I saw a very positive attitude in my people. Josiah returned to Sioux City, Iowa, for a time and then returned to stay with us a second time saying that God was calling him to move his family to Des Moines.

We looked at houses to rent with him and he finally found a place he could afford. We were not hiring him, but he felt he was to be part of the ministry. Josiah told us he needed a different car and a 60-year-old man in our ministry donated his only car to him to help Josiah make the move, a real sacrifice. He went back to pack his things in Sioux City to move to Des Moines.

We had a group on standby to help him unload whenever he called to say he was coming. But he never called. I thought maybe he had lost phone service, or his phone had broken. My people were excited about him coming. I repeatedly called and texted him over several days, but no response.

He contacted me about 10 days later and I believe he was in the Pennsylvania area and had been offered a job at a church. He was following the money. It really devastated my people and they felt very taken advantage of and deceived. The ones feeling convicted to find their zeal Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 44 of 88 Exhibit A+2 lost their hope and it took a long time to move them out of this disappointment.

I felt Josiah was not a person of his word to do such a thing. My people asked what would happen to him. My response, which now seems correct was, "He will be moving a lot until he finally gets himself settled. If he doesn't get settled, he will live a life of constant moving." Today reflecting back, I see he had an orphaned heart.

To Josiah's credit, about 18 months later he called me and met me when I was in Kentucky speaking at a conference. He drove for about 3 hours, and we spent the morning talking and he made a heartfelt apology for how he did things. I crossed his path early in his life journey and didn't have some of the recent things that others have experienced. I feel God may have spared us. I also see that it was a crossroads moment in Josiah's life whether he would submit to leadership or not. Nonetheless, we still put a lot of energy into the situation and suffered deep disappointment.

Alexa Paulsen | Director of Worship Yasha Ministry Sioux City, Iowa

Josiah Johnson came to Sioux City to help our newly opened Yasha Ministry, a House of Healing and Prayer, in 2014. Things moved really fast from the initial zoom call my parents and I had with Josiah and Jenn. Josiah was very charismatic at first and my mom felt led to hire him. For me, there Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 45 of 88 Exhibit Ar2 was a check in my spirit, and I felt like something might be off. However, my parents thought he was an answer to prayer.

In the first few weeks of Josiah's time in Sioux City, they lived with my parents. It wasn't an ideal situation and I noticed some concerning things while they were living with us. Their marriage seemed a little strained, and Jenn seemed very unhappy.

In the following months, things quickly escalated. On several occasions, we attempted to have staff meetings. While in these staff meetings, Josiah had a habit of openly disagreeing with my mom in front of the other staff members. She was the executive director, and he seemed to be on a personal mission to defiantly confront her at any moment presented to him.

These confrontations weren't limited to my mom, unfortunately. On one occasion, he rebuked me in front of the staff. I'm all for a godly correction if needed. However, this instance was far from that.

Josiah started yelling at me telling me I was a spoiled brat and that I treated my worship team poorly. At the time, I felt like I might have needed the humbling, so I cried, repented, and we moved forward. However, the awful feeling of a child being scolded by an unhinged parent never left me.

On one occasion, Josiah attempted to convince a group of my guy friends to move to Des Moines with him and join a big church/ministry there. Thankfully, they ended up not making the move and I praise God they were Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 46 of 88 Exhibit A42 not easily swayed by Josiah's charisma.

In March of 2015, Josiah and Jenn invited me to their house. There, they proceeded to tell me that my beloved, saint of a mother, was actually the "Jezebel of Sioux City". They said she was manipulative and controlling, and Josiah believed that he had been sent to stop her.

Josiah said that he believed that he had been sent by God to end Yasha. He told me that I needed to flee Sioux City for a time and move out of my parents' house. Specifically, out from under my mother's influence. He and Jenn "prophesied" over me, telling me they believed my "destiny was in Peru". I left their house with a migraine, and felt very confused.

Believing them, and feeling conflicted, I moved forward and bought a oneway ticket to Peru. As soon as I arrived at my friend's house in Peru, a guy I had been corresponding with, whisked me off to a beach house with his friends. I had no cell reception and I was trapped there with him for 3 days. The whole time I was there, one of the men said he wanted to get me drunk so he could rape me. He threatened this to me every morning and every night until we left there.

I share that story to emphasize that Josiah and Jenn's "prophetic word" over me was 100% wrong, and that I should have heeded my mom's warning for me not to go to Peru. I recognize that Josiah is not responsible for what happened to me and I have forgiven him and Jenn. However, it is my hope that others will use caution when running to obey the word of man rather than the Word of God. My parents scheduled a meeting to fire Josiah from Yasha Ministry and he said, "Well, I'm quitting anyways." Two weeks later, Josiah and Jenn discreetly left Sioux City.

The firsthand accounts above from multiple people and ministry leaders in different states spanning over a decade clearly establishes Josiah Johnson's repeated patterns of false accusation, manipulation, intimidation, destruction, and division in the body of Christ.

At Our Father's House on April 23, 2023, in response to a message that our brother Jeremiah preached on the Jezebel spirit, Josiah himself came forward and publicly confessed: "I have used my anger and my rage to manipulate and to intimidate and to make people afraid of me. And not all the time, but I've definitely done it to my children more than anything and I've done it to my wife" (Direct quotes recorded on our livestream). Josiah then admitted to using these same tactics of manipulation and intimidation to become a successful car salesman.

As one of his younger brothers, I have often felt helpless to help all of the unsuspecting people who fall prey to his manipulative and abusive leadership. Knowing Josiah to be an extremely unstable and unhealthy person, I have kept my distance as he has attempted and failed to plant churches in at least 4 places that I know of (Altoona, Pennsylvania; Clarksville, Tennessee; Lancaster, California; Pensacola, Florida). Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 48 of 88 Exhibit A:2 Since marrying his wife, Jennifer, 12 years ago, Josiah has moved his family over 25 times, 18 of those moves were across state lines. Instead of repentance and restoration, they have chosen to relocate instead.

The list of godly character qualifications in 1 Timothy 3:1-7 and Titus 1:5-9 clearly disqualifies Josiah from being a leader in the body of Christ. His life and character are far from being "above reproach", his home is managed poorly, his children are completely out of control, his public reputation is marred, he often lacks any self-control, and he is entirely pugnacious, a bully and violent aggressor prone to quarrel and quick to fight.

In the fall of 2020, Josiah was travelling through Indiana and had two people with him when he asked to meet with me. He introduced me to a married couple who were on an extended mission trip and were going out to California to assist Josiah with his "church plant" - or so they thought. They immediately started to see Josiah's manipulation and ask questions, leading them to be "removed" from leadership and shortly after they left California after only one month of being there. Thankfully, they reached back out to me upon leaving California and I was able to talk them through the difficulty they unexpectedly endured.

They personally witnessed Josiah on one occasion take a significant amount of cash from someone in exchange for a prophetic word. Josiah attempted to bully and threaten them after they asked for accountability for the finances that were being given in support of the "church plant".

This couple then connected me with the family who hosted Josiah's church

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 49 of 88 Exhibit Arg plant in their home for three months before it closed and Josiah moved his family out of California. They also reported being manipulated, lied to, and threatened, as well as having their personal possessions broken without apology.

On Josiah and Jenn's final day before leaving California, they had a garage sale to get rid of some of their things. Josiah came completely unhinged, sending threatening text messages to one of the couples and even at one point physically putting his hand on top of the husband's head while screaming at him. Josiah then called the other man "the spawn of Satan" and referred to his recently deceased father as "the devil". Both of the aforementioned couples witnessed Josiah's unrestrained outburst of anger firsthand.

Perhaps the most concerning part of this unfortunate compendium is that Josiah is clearly delusional and firmly believes he is doing the will of God by accusing, manipulating, slandering, dividing, and hurting people, especially church leaders who resist and oppose him. Regardless of his threats and false accusations, true shepherds have a responsibility before the Lord to protect the flock and fend off wolves who would prey on the weak and vulnerable among us. I'm thankful for the courage of these leaders and people who have stepped forward to share their story and do just that.

May God use this warning to mark Josiah Johnson for division in the body of Christ and cause many to avoid him according to Romans 16:17-18. And may God show abundant mercy to Josiah and Jennifer and grant them grace to open their eyes to the truth and lead them to humility and Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 50 of 88 Exhibit A52 repentance.

Paul T. Johnson | Founder

Our Father's House Avon, Indiana

The following ministry leaders have carefully reviewed this document and, based upon their personal experience with the destruction and division Josiah Johnson has caused, endorse the public release of this letter warning the body of Christ:

Greg Crawford | Founder

The Base Des Moines, Iowa

Austin Hofsommer | Elder

Our Father's House Avon, Indiana

Brandon Jenkins | Elder

Heart of the Father Ministry Lakeland, Florida

Jeremiah Johnson | Founder

The Altar Global Kannapolis, North Carolina Case 4:25-cv-00003-O Document 1 Fi

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Barry Nichols | Elder

Heart of the Father Ministry Lakeland, Florida

Riley Shelton | Senior Pastor

The Way Church Hartwell, Georgia

Benjamin Sullivan | Elder

Our Father's House Avon, Indiana

Joseph Sweet | Senior Pastor

Shekinah Worship Center Lancaster, California

David Vespa | Elder

Heart of the Father Ministry Lakeland, Florida

Mitchell Wasmund | Elder

Our Father's House Avon, Indiana

Andrew Yusko | Founder

Lighthouse Ministry Palm City, Florida

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Josiah Johnson: A Dangerous & Divisive Man A Warning to the Body of Christ

By Paul T. Johnson

For over a decade, I have carefully observed Josiah Johnson's life and ministry and felt deeply grieved at the widespread destruction and division he has caused throughout the body of Christ. This document explicitly, yet not exhaustively, details some of that destruction and division and serves as a warning to the body of Christ to *mark Josiah Johnson for division and avoid him completely* until he repents and is properly restored to the Lord's body by capable and qualified leaders (Romans 16:17-18, Galatians 6:1, Titus 3:10-11).

In February of 2024, I confronted Josiah in two separate conversations (one in person and one via phone) about his lack of Christlike character, volatile history, and the absence of any real accountability for his life and ministry. Josiah's established and repeated pattern of manipulation, intimidation, jealousy, slander, anger, lying, and division is seriously concerning.

Romans 16:17-18 (AMPC) instructs us to "be on your guard concerning those who create dissensions and difficulties and cause divisions, in opposition to the doctrine which you have been taught. [I warn you to turn aside from them, to] avoid them. For such persons do not serve our Lord Christ but their own appetites and base desires, and by ingratiating and flattering speech, they beguile the hearts of the unsuspecting and simpleminded." Josiah, along with his wife, Jennifer Johnson, have deceived and divided many innocent and unsuspecting people and families by their flattering speech and cunning behavior. Full of envy and malice, Josiah has appointed himself as the chief prosecutor of the church.

Although he has never been stable or consistent enough to lead any legitimate church or ministry for more than a few months, he boldly lectures others on what a healthy ministry should look like. Any person who lovingly challenges Josiah and objects to his behavior or dares to try and bring him into order is accused of personal compromise, hidden sin, or worse.

As clear evidence of Josiah's corrupt character, I have included screenshots from a group text message between me, Josiah, and another one of our brothers, Jeremiah. These texts from June 2, 2022, occurred at a very painful intersection for our family as our father was diagnosed with terminal cancer.

With full knowledge and permission from our father, I shared his situation online to ask the body of Christ to pray for him. The text messages serve as a small but accurate window into Josiah's pattern of threatening and intimidating people:

(Note - Jeremiah's text response to Josiah is in blue.)

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		Paul Johnson		MA			
	PJ	permission bef that is going to please don't sh	is and Melissa's fore posting publicly. If be your attitude, now up tomorrow. Your ul so leave it in TN or	1999 B			
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		And you won't					
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		Sinful attitude					
		Your hilarious F	Paul				
		Just I'm case y forgot my	ou two boneheads				
		He was my fath	ner before he was your	rs			
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		Josiah Johnson					
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			hole Jerry and I hate thing I have dude				

In an effort to adequately and effectively warn the body of Christ according to Romans 16:17-18 about their divisive and destructive behavior now spanning over a decade, I have compiled the following Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 57 of 88 Exhibit A-3 statements below from pastors and people who have each experienced firsthand Josiah and Jennifer's venom and discord.

I also spoke with six additional pastors (all in different states) who readily confirmed they have also witnessed unhealthy and ungodly behavior in Josiah and Jenn and they encouraged me in compiling this document so unsuspecting people could be *warned to avoid them*.

Please note that none of these people personally know each other and they have not spoken to each other in regards to this document.

Below are their statements concerning Josiah and Jennifer Johnson:

Elizabeth Heller Orange Beach, Alabama

On Friday March 22, 2024, I texted Jenn Johnson a message about my marriage asking for prayer for my husband, Michael. Around 11:00am that morning, Jenn and Josiah called me and told me to get the kids and come over to their house immediately.

They told me not to answer any calls from Michael and to just come over. I went to their house where they informed me that they had called for a church meeting in their home at 6pm and told Michael to be there. They had me turn off my phone at that point. What I didn't know is that instead of telling Michael there was a meeting, Josiah had called and threatened him saying if he ever wanted to see his wife and kids again to be at their house at 6pm.

Before the meeting started, I said to Josiah that I pray that God would work and move in my husband so that our marriage would be better. Josiah's response to that was, "That's not the way this thing is going to go down." The meeting started with a lot of yelling on Josiah's part. I did very little talking that night. It was mostly Jenn, Josiah, and other members of their "church" leading the conversation. Jenn wrote on a piece of paper and gave it to me telling me to tell Michael that I was leaving him regardless of what happens tonight. So, whether he repents or apologizes to me, it wouldn't matter and that I still needed to leave him.

It was *never* my intention or plan to leave my husband. I wanted someone to talk to about my marriage, pray with me, and help us work on our marriage. But they were not interested in helping me or us at all.

Jennifer told my oldest daughter not to even go near her dad because he was Jezebel. Josiah told Michael, "You need to quit your job today or you will lose your wife and kids right now." Josiah was angry and when Michael refused to quit his job and walked over to me and our two daughters and asked if they were ready to go home, Jennifer yelled across the room, "What are you doing?" Michael replied, "I'm talking to my kids."

Jennifer then rushed over to where we were seated and said, "No, you're not! Get out of my house right now!" Then Josiah and another church member ran over and pushed Michael up against the wall. Then they grabbed his arms and forcefully pushed him out of the front door. After Michael was gone, I heard Josiah and Stuart talking about guns. Stuart said, "I brought mine if I need it."

After church on Sunday, Jenn and Josiah told me that I needed to file a PFA (Protection From Abuse) order against Michael even though there was no legitimate reason to. They kept insisting until I finally went on Tuesday, March 26, 2024 to file it. I went inside, got the paperwork, sat down to fill it out, and couldn't do it. So, I took the PFA paperwork outside to the car and sat and cried because I did not want to fill it out. I told Jenn I couldn't do it, Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 59 of 88 Exhibit A53 that I could not lie. She told me I had to do it or Michael was going to destroy me and take the kids from me. She said, "One way or another you're going to court."

The temporary PFA was put into place and Jenn and Josiah wanted Michael to violate it and go to jail. They continually wanted me to press charges on him to try to get him in trouble. They also told me that I needed to put a post on Facebook to "claim the narrative" as they say. I did not want to do that either, yet once again they insisted and even helped me write it.

Michael and I went to court on April 11, 2024 for the PFA and custody. The PFA was dropped. Michael came to pick up the kids as the judge granted and we ended up talking for about an hour. Michael sincerely and whole heartedly apologized for issues in our marriage and wanted to reconcile and make things right. He hugged me and cried, begging for me to forgive him. I told him that I forgave him.

I texted Jenn on Facebook that morning telling her that I did not want a divorce. I told her that Michael set up marriage counseling for us if I was willing to go. I told her I felt hope for my marriage. I told her I wanted to go home.

She replied with a very long, unhappy message stating that "Jesus Himself could not change Michael" so how could a counselor. Jenn said, "You will have to give an account to the Lord if you go back to him."

On Friday night, I called Michael when I felt the Holy Spirit showing me it's time to go home. Michael told me he would come and get me and our belongings right away and came to pick us up around 3:30am. Jenn and Josiah were very upset and told the rest of the "church family" to have nothing to do with me. This happens very frequently with Josiah and Jenn if you don't "submit" to their leadership and do what they say.

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The following day another family in the home packed up their stuff and left in the middle of the night. They called me once they arrived back in their home state to tell me that they had left as well and that Jenn and Josiah were very upset with them. They left out of fear in the middle of the night as well. I was happy to hear they had also left and returned home. Jenn and Josiah were so mad that we all left that they bashed us to the rest of the church on the group chat.

I am thankful that we have all left but there is still major fear of backlash and retaliation for us leaving. Josiah and Jenn are not quick to give up their control over people. We are scared that they are going to come to our home to cause problems but we have already told them to leave us alone so we pray that they will do just that. We also pray that they will not do this to any other families moving forward. It's been the worst month of our lives because of these people.

I also want everyone to beware of giving to their church. Josiah and Jenn manipulated me and my husband to give to the church by taking us out to eat and pressuring us to "be faithful to the Lord". Josiah said things like, "If you don't give, the Lord will take your whole family down." He uses the Lord to manipulate and condemn you for his benefit. After we agreed to give a large sum of money to the church, he then directed us to write the check out to him personally so we did. It was a big red flag that right after giving him our money, he stopped calling and pressuring us because they got what they really wanted – money.

Barry Nichols, David Vespa, Brandon Jenkins | Elders Heart of the Father Ministry Lakeland, Florida

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 61 of 88 Exhibit A:3 Josiah Johnson has attended Heart of the Father Ministry during two

different time periods. He was in and out during the early days of 2010 -2013, and then again from October 2021 - April 2022. Both of these seasons with Josiah have been difficult and destructive.

Prior to their most recent time here, Josiah and Jennifer reached out to us desiring to come be a part of our community. We agreed as elders to receive them into our community and give them one more opportunity to get whole and healthy, given their difficult and destructive history with us. We met with them upon their arrival and told them we don't want any of the drama or destructive behavior they displayed in times past. They agreed.

Since 2010, our experience and observation has been that Josiah has been a person who would go through dramatic emotional and spiritual cycles. At times he seemed to be fully engaged in relationship with the Lord and then he would become offended, highly critical and angry, obsessing on the perceived faults of others, especially related to his brother Jeremiah and church leadership in general. Next, he would withdraw, and often, backslide into a season of depression, worldliness and sin.

We have observed these cycles multiple times while Josiah has been here at Heart of the Father; and from our perspective, those cycles continue to occur. We have observed Josiah's explosive anger on display a number of times. So, it is not a surprise to us, that less than a year ago, Josiah publicly confessed to using his anger to manipulate even those closest to him.

"Do not make friends with a person given to anger, or go with a hot-tempered person, or you will learn his ways and find a snare for yourself." - Proverbs 22:24-25

In conjunction with his destructive anger, during his dark cycles, Josiah also

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 62 of 88 Exhibit Ac2 freely spews out attacking, threatening, demeaning and insulting language.

The most recent in-person incidents towards us were in early 2022 when he stood up in a restaurant, shook his finger angrily, and shouted "You're a coward! You're a coward!"

He also hurled other such words and texts at us, that we were "liars", "selfrighteous", and that we had "made truces with Jezebel and Ahab, are double minded and double tongued, are guilty of having blood on our hands, are filled with ambition, are passive men, are unwilling to repent, have become complicit to wickedness, hypocrisy, delusion and duplicity." We have witnessed these kinds of verbal attacks multiple times, including recently in texts. This is Josiah's way.

"I wrote to you not to associate with any so-called brother if he is a sexually immoral person, or a greedy person, or an idolater, or is **verbally abusive**, or habitually drunk, or a swindler - not even to eat with such a person." - 1 Corinthians 5:11

Ever since we have known Josiah and the Johnson family, there has always been a level of jealousy that existed in Josiah towards his brother Jeremiah. At times, the jealousy would remain under the surface and then the cycle would shift to outright animosity and verbal and emotional attacks. From our perspective, this cycle of jealousy continues until this day.

During a meeting with Josiah in early 2022, Barry told Josiah that he didn't believe that Josiah's anger was really against Jeremiah or us, but actually against God. That Josiah was angry with God for not taking out Jeremiah for him. In an honest moment Josiah answered, "You might be right."

We have also observed how Josiah and Jennifer actually work 'behind the scenes' to gather any kind of information that could be damaging or discrediting to leadership. In the case of Heart of the Father, it didn't take

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 63 of 88 Exhibit Ac3 long before Josiah and Jenn became disgruntled and frustrated because in their minds our church lacked vision and a prophetic voice.

They both began having conversations about this with individuals in the church, including with a trusted leader in our church community. This leader shared with Josiah and Jennifer some general information about how they felt the church was doing and how they had been praying for forward progress and growth in the things they believed God wanted to do. This leader also expressed to Josiah and Jenn that they completely trusted the elders' leadership and ultimately the Lord would have His way.

Shortly after this conversation, Josiah and Jenn shared with the elders that we had people on our leadership team who were disgruntled and struggling because of our poor leadership. After speaking with this leader personally, it became clear that the Johnsons had left out important information and ignored the context and spirit of the leader's words in order to try to build a case for how Josiah and Jenn's leadership was needed in our community!

We also observed this kind of 'web spinning' activity in our last in-person meeting. Since there was obvious relational tension between the elders and the Johnsons and there were clearly divisive forces at work in our church community, the elders called for a meeting with Josiah and Jenn.

After a few weeks of trying to work out schedules, Josiah flatly refused to meet with us. It was discussed early on that perhaps the elders' wives would also attend, but that detail was forgotten because of the length of time it took to schedule the meeting. The meeting occurred on April 10, 2022. Only Jenn came. She said she was expecting the wives to be there as well. We offered to reschedule the meeting. She said that it would be fine to meet without the wives.

Then Jenn offered to open the meeting in prayer, and while we were

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 64 of 88 Exhibit Act praying, she secretly slipped her phone under her Bible and began

recording the conversation. She never mentioned the recording to us. That is actually a felony under Florida law, and it shows the deceptive means they were willing employ to try to gather any kind of damaging information. After Josiah heard the recording, he sent insulting text messages calling us 'cowards' and 'liars' etc.

"Reject a divisive person after a first and second warning, knowing that such a person has deviated from what is right and is sinning, being self-condemned." - Titus 3:10-11

It is clear to us that Josiah and Jennifer Johnson are unhealthy, divisive and a destructive force in the Body of Christ. They know the correct Christian language and the right face to put on things, so they have skill in manipulation. But from our perspective, they operate out of jealousy and a desire for prominence and recognition and their influence and "ministry" is detrimental to the heart and purposes of Jesus in His Church.

Riley Shelton | Senior Pastor The Way Church Hartwell, Georgia

I met Josiah Johnson and his wife Jenn in the fall of 2023 through our Associate Pastor Stuart Graham. Stuart had met Josiah at a mutual friend's wedding several years earlier. He told me that Josiah called him out of the blue one day, several months before, and told him that the Lord had laid him on his heart to call him.

I found out much later that this had grown into a weekly facetime phone call with Stuart and his wife being "mentored" by the Johnsons over a period of 5 months. Stuart approached me one day and told me that Josiah

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 65 of 88 Exhibit Ac3 was coming to town to visit them and would I consider allowing him to

preach. He was impressed with Josiah's anointing and knowledge of the Word of God and said he would like for our church family to hear him and for my wife and I to meet him.

Because of the timing that I would be recovering from outpatient hernia surgery that week, and because I trusted Stuart, I agreed, but I called Josiah to speak with him first. On the phone Josiah was quite respectful and came across as very skilled in spiritual matters. He respectfully used "Yes Sir, No Sir" and told me that he did not ask to preach but was only coming to visit, but that Stuart and his wife wanted him to, and they also wanted Jenn to help lead worship. Our Worship Pastor welcomed Jenn into the worship team that day.

So, we honored our guests when they came, he preached and for the most part what he said that Sunday was ok, but then he began to make some points on how he didn't agree with how the local church should operate. It didn't take long before I discovered he had an agenda, was a master manipulator, and was causing many concerns with his accusations against The Way Church.

Before he left town, Stuart was convinced he was to leave the church, sell his farm and business, leave their dream behind, and join them in Orange Beach, AL. With help of the Grahams, they had already targeted different young adults in our church and had them come to the Graham's home to meet with them, without my knowing, trying to convince them to go to Orange Beach.

The day that Josiah preached, Jenn convinced one young man in our church that the Lord spoke to her and said, "he was to marry her sister." They convinced him to sell his business immediately and move to Orange Beach. So, he got his brother to take over his business, left his dad with debt, and

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 66 of 88 Exhibit A63 within 3 months he married her sister.

We have known this young man and his family since he was a young boy and his family supported him, loved him, and prayed for him for 14 years through his struggles with drug addiction, relapses, jail, financial disasters, and then finally deliverance and full recovery. He surrendered his life to the Lord and was on the right track.

Jenn was overheard at church to say, "As soon as I saw him, I knew he was supposed to go with us." He soon came under Josiah's influence, but the Grahams were also instrumental in convincing him to go. They soon convinced the son to cut all ties with his mom and sister unless they were willing to humble themselves and repent of their sins and that they were not allowed to come to the wedding. He was, however, allowed to text his dad and brother, because they were lost, and it could affect their salvation.

We have known this young man's family for 24 years. They aren't perfect but we have only seen them love, forgive, and support their son. For 14 years this mama cried out, fasted, prayed, warred in the Spirit, lost countless hours of sleep, and even went through cancer battling for her son's life. To see him restored, then to be totally banned from speaking to him or seeing him because they convinced her son that all his issues were her fault. This mom and family were not even allowed to attend his wedding in March 2024. They are all quite hurt, and two of them have been going through counseling.

Just before the wedding, we facilitated a face-to-face meeting at our church between this mom and dad, Josiah and Jenn, and the Grahams, with hopes of them having access to their son. It quickly turned into condemnation, accusation, and word cursing toward the mom.

In hopes that she could see her son, she humbled herself in tears and

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 67 of 88 Exhibit Ac3 repentance to them for investigating their ministry and for reaching out to

his brother Paul's wife in concern for her son. Josiah called her Jezebel and told her he was unmoved by her tears and that her repentance wasn't real. We have never witnessed such un-Christlike spiritual abuse. The meeting was brought to a stop.

Josiah accused me of poor and passive leadership enabling sin. Prior to the meeting, we had learned that they had been communicating with people within the church saying that my wife was a Jezebel, operating in witchcraft, and they word cursed all our leadership and our church family, telling the young people they needed to leave from there or others not to go there. The four of them were confronted about that at the meeting, which quietened things for a moment, but they never repented.

Before leaving, the father, who is unchurched, expressed what he had observed in the meeting, saying that he saw them as hypocrites and not very good Christians. Josiah angrily Bible bashed the father with Scripture telling him he was lost and going to hell, separated from the Father, and it was time to stop hiding behind church hurt. At that point the meeting was immediately adjourned. Nothing was accomplished except a mom and dad leaving criticized, condemned, spiritually abused and humiliated, still not allowed to speak to their son.

Another couple, also members of our church family, were convinced to sell their new home, quit his job, and move to Orange Beach to join Josiah's group. The husband, after being there a few weeks, said he realized that he was caught up in some sort of cult and needed to leave. Josiah and Jenn angrily told him that his wife and children were staying with them and had convinced the wife that she needed to divorce him and that he had a demon in him. They have 3 children and one on the way, due this month (April).

He is unable to communicate with them or see them and could not see his

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 68 of 88 Exhibit Ac3 daughter on her birthday recently. The wife has cut off all ties to the

husband, her mother, and her grandmother until they repent of their sins. I received a call from her upset grandmother telling me she had been forbidden to see her granddaughter and great grandchildren.

We have also come to learn that they are still contacting and trying to lure some folks from our church family to Orange Beach. Most are now aware and alert to it. We know that God loves Josiah and Jenn, has purpose for them in His Kingdom, but they are deceived and on a wrong road. We have forgiven them and pray for them often to have a Damascus Road encounter with the Lord and be restored in a right place with God.

We are also praying daily that the young man from our church will be awakened from the deception and be set free from the stronghold, and reconnected back to his family here in Hartwell, GA. However, he will now always be connected to them because he married Jenn's sister. His family still needs to forgive, need much prayer, and realize that they, also, are now always connected to them by marriage.

We pray that the Graham's will come to understanding that they have been hijacked by deception. They, and all connected to that group, need much prayer.

Joe Sweet | Senior Pastor Shekinah Worship Center Lancaster, California

Josiah Johnson reached out to me in the Spring of 2020 claiming he saw me as a "spiritual father" and that he was willing to be trained. We gave him an opportunity to be mentored. We soon found out that he was very highly skilled at "talking the talk" but very poor at "walking the walk" of a

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 69 of 88 Exhibit Ac3 Christian with fruit of the Spirit or godly character.

Looking back, we found out that within the first two weeks of being here, he was already sowing seeds of discord. Over time it became apparent that he was driven by selfish ambition for a pulpit and bitter jealousy of anyone who had a ministry platform.

He began to go to various members of our staff, behind my back, and lay out a case to them that I (the senior pastor) was overworked and not healthy physically and emotionally and that I urgently needed a threemonth sabbatical. Pretending to care, he told them that he knew the Lord had brought him here so that when I was away, he would fill the pulpit and run things. He was urging them, that if they loved me, they would insist I would go away for at least three months or more. He wanted them to "gang up" on me and pressure me to leave on sabbatical.

He took on the role of an Absalom, intentionally asking various staff members behind my back if they had any grievances against me. He told them he was sent there to help the church get healthy.

These things were reported to me by people that had been with our ministry for over twenty years. These are people that I know, love, and trust. They were very concerned about his behavior. Others were confused because Josiah put on such an air of sincere caring.

Others in the body told me that he would reach out to them to have lunch or dinner with them. As soon as they sat down, they reported that Josiah would begin to berate and tear me down and explain that he was there to help the church.

I personally caught him lying to me more than once. I finally sat him down to talk to him about his negative attitudes and poor work habits. He

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 70 of 88 Exhibit Ar3 became angry and defensive, then went on the attack and began railing

accusations against me. He then began yelling at me and "prophesied" that I was "sitting on a railroad track and a bullet train of God's judgment was speeding toward me." As he was verbally abusing me in the name of "prophetic ministry" he implied that I could be killed by God.

Needless to say, he was relieved of his employment that day. I had to meet him at the church office a few hours later so he could get his belongings out of the office. He and his wife, Jennifer, stood in the church office and yelling loudly and angrily, he pointed his finger at me saying, "You have more demons in you than any man I have ever met. You are coming down! This church is coming down!"

After the board had agreed to fire Josiah for his incompetence, discord, dishonesty, and division, many testimonies surfaced of how he had been sowing discord and division in the body, hoping that he could take over the pulpit.

A dear elderly saint who has been a part of our church for 25+ years had been renting part of her home to Josiah and his family. She told me that when Josiah was relieved of his job at the church, he told her "My mission from the Lord is to bring Joe Sweet down." She also told me that the entire time his family stayed at her house, there was discord and no peace and that his children were "out of control." Hearing him say what he did, she asked him to move out asap. Our senior worship leader said that Josiah came to her and said "I want you to know that you and all the worship team mean nothing to Joe Sweet." He tried to encourage them to leave the church and follow him in his new "church plant" here in town. Of course, they saw through his wickedness and didn't respond.

The Sunday after Josiah was fired, he came back to church with a few of his "friends." When he came to Lancaster, he asked a couple of his friends to

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 71 of 88 Exhibit A-3 move here with him. They sat in the back of the church, and in the middle

of the message he jumped up, interrupted the service and began loudly screaming railing accusations against me. I calmly asked him to stop. He ignored it and continued screaming.

Ushers and security team tried to escort him out of the building. He became physical and the sheriff had to be called. Once he was outside, he remained in the parking lot with his wife and two children. When service was over, he began making a scene and yelling at all the people to not listen to me or follow me.

While he and his wife were doing this, his two small children were unattended and one of them ran out into the busy four-lane street in front of the church. Neither Josiah nor his wife knew this as they were not taking care of their children. My daughter-in-law ran out into the street to get their son out of harm's way.

We ended up having a restraining order preventing Josiah from coming back to harass church members. During the time that he was actively sowing discord against me, he was able to draw about five people to follow him to his new "church plant." Josiah had a copy of the church phone directory that he obtained earlier from the church office. Numerous people in our body were called by him as he tried to recruit them to leave our church and go with him to his new "home church" plant.

The week after he left, he began sending profane, insulting, and defaming texts daily to my wife. She ended up blocking his number to stop the harassment.

His "church" plant fizzled out after about three months and he packed up and left town. Several months after that, the wife of one of the couples that had been duped by him and been part of his "home church" plant came to Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 72 of 88 Exhibit A-3 me to apologize. She said, "We were deceived by him." She went on to say how, over time they began to see his true nature. She said they felt used by him, misled, hurt, and disillusioned.

There is much more that could be said about his ungodly, dishonest and divisive behavior. Following is a quote from the Shekinah Worship Board meeting in which Josiah was fired.

A Resolution of the Board of Directors of Shekinah Worship Center:

"The undersigned Board of Directors, after discussion, have unanimously agreed to release Josiah Johnson from employment at Shekinah Worship Center effective immediately due to his grossly poor work habits, dishonesty, divisiveness, contempt and malice." (July 28, 2020)

Alexa Paulsen | Director of Worship Yasha Ministry Sioux City, Iowa

Josiah Johnson came to Sioux City to help our newly opened Yasha Ministry, a House of Healing and Prayer, in 2014. Things moved really fast from the initial zoom call my parents and I had with Josiah and Jenn. Josiah was very charismatic at first and my mom felt led to hire him. For me, there was a check in my spirit, and I felt like something might be off. However, my parents thought he was an answer to prayer.

In the first few weeks of Josiah's time in Sioux City, they lived with my parents. It wasn't an ideal situation and I noticed some concerning things while they were living with us. Their marriage seemed a little strained, and Jenn seemed very unhappy. Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 73 of 88 Exhibit A-3 In the following months, things quickly escalated. On several occasions, we attempted to have staff meetings. While in these staff meetings, Josiah had a habit of openly disagreeing with my mom in front of the other staff members. She was the executive director, and he seemed to be on a personal mission to defiantly confront her at any moment presented to him.

These confrontations weren't limited to my mom, unfortunately. On one occasion, he rebuked me in front of the staff. I'm all for a godly correction if needed. However, this instance was far from that.

Josiah started yelling at me telling me I was a spoiled brat and that I treated my worship team poorly. At the time, I felt like I might have needed the humbling, so I cried, repented, and we moved forward. However, the awful feeling of a child being scolded by an unhinged parent never left me.

On one occasion, Josiah attempted to convince a group of my guy friends to move to Des Moines with him and join a big church/ministry there. Thankfully, they ended up not making the move and I praise God they were not easily swayed by Josiah's charisma.

In March of 2015, Josiah and Jenn invited me to their house. There, they proceeded to tell me that my beloved, saint of a mother, was actually the "Jezebel of Sioux City". They said she was manipulative and controlling, and Josiah believed that he had been sent to stop her.

Josiah said that he believed that he had been sent by God to end Yasha. He told me that I needed to flee Sioux City for a time and move out of my parents' house. Specifically, out from under my mother's influence. He and Jenn "prophesied" over me, telling me they believed my "destiny was in Peru". I left their house with a migraine, and felt very confused.

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 74 of 88 Exhibit A-3 Believing them, and feeling conflicted, I moved forward and bought a one-

way ticket to Peru. As soon as I arrived at my friend's house in Peru, a guy I had been corresponding with, whisked me off to a beach house with his friends. I had no cell reception and I was trapped there with him for 3 days. The whole time I was there, one of the men said he wanted to get me drunk so he could rape me. He threatened this to me every morning and every night until we left there.

I share that story to emphasize that Josiah and Jenn's "prophetic word" over me was 100% wrong, and that I should have heeded my mom's warning for me not to go to Peru. I recognize that Josiah is not responsible for what happened to me and I have forgiven him and Jenn. However, it is my hope that others will use caution when running to obey the word of man rather than the Word of God.

My parents scheduled a meeting to fire Josiah from Yasha Ministry and he said, "Well, I'm quitting anyways." Two weeks later, Josiah and Jenn discreetly left Sioux City.

The firsthand accounts above from multiple people and ministry leaders in different states spanning over a decade clearly establishes Josiah Johnson's repeated patterns of false accusation, manipulation, intimidation, destruction, and division in the body of Christ.

At Our Father's House on April 23, 2023, in response to a message that our brother Jeremiah preached on the Jezebel spirit, Josiah himself came forward and publicly confessed: "I have used my anger and my rage to manipulate and to intimidate and to make people afraid of me. And not all the time, but I've definitely done it to my children more than anything and I've done it to my wife" (Direct quotes recorded on our livestream). Josiah then admitted to using these same tactics of manipulation and intimidation

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 75 of 88 Exhibit A-3 to become a successful car salesman.

As one of his younger brothers, I have often felt helpless to help all of the unsuspecting people who fall prey to his manipulative and abusive leadership. Knowing Josiah to be an extremely unstable and unhealthy person, I have kept my distance as he has attempted and failed to plant churches in at least 4 places that I know of (Altoona, Pennsylvania; Clarksville, Tennessee; Lancaster, California; Pensacola, Florida).

Since marrying his wife, Jennifer, 12 years ago, Josiah has moved his family over 25 times, 18 of those moves were across state lines. Instead of repentance and restoration, they have chosen to relocate instead.

The list of godly character qualifications in 1 Timothy 3:1-7 and Titus 1:5-9 clearly disqualifies Josiah from being a leader in the body of Christ. His life and character are far from being "above reproach", his home is managed poorly, his children are completely out of control, his public reputation is marred, he often lacks any self-control, and he is entirely pugnacious, a bully and violent aggressor prone to quarrel and quick to fight.

In the fall of 2020, Josiah was travelling through Indiana and had two people with him when he asked to meet with me. He introduced me to a married couple who were on an extended mission trip and were going out to California to assist Josiah with his "church plant" - or so they thought. They immediately started to see Josiah's manipulation and ask questions, leading them to be "removed" from leadership and shortly after they left California after only one month of being there. Thankfully, they reached back out to me upon leaving California and I was able to talk them through the difficulty they unexpectedly endured.

They personally witnessed Josiah on one occasion take a significant amount of cash from someone in exchange for a prophetic word. Josiah

Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 76 of 88 Exhibit A73 attempted to bully and threaten them after they asked for accountability for the finances that were being given in support of the "church plant".

This couple then connected me with the family who hosted Josiah's church plant in their home for three months before it closed and Josiah moved his family out of California. They also reported being manipulated, lied to, and threatened, as well as having their personal possessions broken without apology.

On Josiah and Jenn's final day before leaving California, they had a garage sale to get rid of some of their things. Josiah came completely unhinged, sending threatening text messages to one of the couples and even at one point physically putting his hand on top of the husband's head while screaming at him. Josiah then called the other man "the spawn of Satan" and referred to his recently deceased father as "the devil". Both of the aforementioned couples witnessed Josiah's unrestrained outburst of anger firsthand.

Perhaps the most concerning part of this unfortunate compendium is that Josiah is clearly delusional and firmly believes he is doing the will of God by accusing, manipulating, slandering, dividing, and hurting people, especially church leaders who resist and oppose him. Regardless of his threats and false accusations, true shepherds have a responsibility before the Lord to protect the flock and fend off wolves who would prey on the weak and vulnerable among us. I'm thankful for the courage of these leaders and people who have stepped forward to share their story and do just that.

May God use this warning to mark Josiah Johnson for division in the body of Christ and cause many to avoid him according to Romans 16:17-18. And may God show abundant mercy to Josiah and Jennifer and grant them grace to open their eyes to the truth and lead them to humility and repentance.

Paul T. Johnson | Founder

Our Father's House Avon, Indiana

The following ministry leaders have carefully reviewed this document and, based upon their personal experience with the destruction and division Josiah Johnson has caused, endorse the public release of this letter warning the body of Christ:

Austin Hofsommer | Elder

Our Father's House Avon, Indiana

Brandon Jenkins | Elder

Heart of the Father Ministry Lakeland, Florida

Jeremiah Johnson | Founder

The Altar Global Kannapolis, North Carolina

Barry Nichols | Elder

Heart of the Father Ministry Lakeland, Florida

Riley Shelton | Senior Pastor

The Way Church Hartwell, Georgia

Benjamin Sullivan | Elder

Our Father's House

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Joseph Sweet | Senior Pastor

Shekinah Worship Center Lancaster, California

David Vespa | Elder

Heart of the Father Ministry Lakeland, Florida

Mitchell Wasmund | Elder

Our Father's House Avon, Indiana

Andrew Yusko | Founder

Lighthouse Ministry Palm City, Florida Case 4:25-cv-00003-O Document 1 Filed 01/02/25 Page 79 of 88 Exhibit Ave NORREDLAW PLLC Intellectual Property • Litigation • Bankruptcy

November 7, 2024

Jeremiah Johnson

Via Regular Mail and CMRRR No. 9589 0710 5270 1016 7226 48

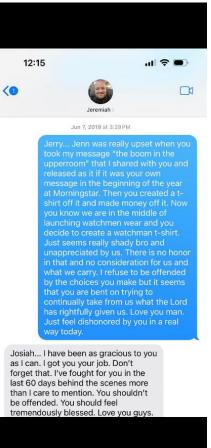
Re: Defamation of Josiah and Jennifer Johnson

I represent Josiah and Jennifer Johnson and write this letter in an attempt to seek redress for your defamatory statements.

Facts of the Matter

As you are well aware Josiah has privately confronted you about alleged plagiarism and fabrication of prophecies attributed to divine oracles. Specifically, Josiah has alleged that the turn of phrase "a boom in the upper room," is of his own coinage and that you misattributed Josiah's turn of phrase to a divine revelation made you yourself.

This is by no means the first documented instance of plagiarism¹ on your part.² You are further aware that Josiah publicly called you out for the plagiarism of the phrase on Facebook on March 12, 2024 and ultimately shared his views on the incident with a reporter with the Washington Post, Danielle Paquette leading to publication of an article thereon on August 10, 2024.³



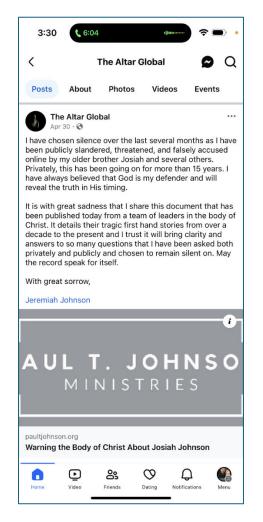
¹ https://protestia.com/2020/09/21/charismatic-prophet-jeremiah-johnson-plagiarizes-j-d-halls-imprecatory-post-against-ruth-bader-ginsberg/

² https://robertgladstone.org/index.php/2024/03/20/den-of-thieves-part-2/

³ https://www.washingtonpost.com/nation/interactive/2024/trump-prophecy-josiah-jeremiah-johnsonalabama/?itid=hp-top-table-main_p001_f007

Other prominent news outlets picked up and further amplified the story.⁴

In response, you conspired with and used your other brother, Paul, as a proxy and you retaliated when in April of 2024 you used Paul to post an article titled "Josiah Johnson: A Dangerous & Divisive Man *A Warning to the Body of Christ.*"⁵ (the "Statement") And then posted the same article on your Facebook page. You knowingly cooperated with Paul to publish the false and defamatory Statement so that you could use it to discredit Josiah and his accusations of plagiarism against you by disseminating it among your followers as follows:



In that Statement Paul commented on Josiah Johnson's ministerial professionalism by disparaging his character and accused him of being unfit to participate in ministry on account of "his lack of Christlike character, volatile history, and the absence of any real accountability for his life and ministry."

⁴ https://www.newsweek.com/jeremiah-josiah-johnson-pro-trump-fake-prophecies-1937428

⁵ https://www.paultjohnson.org/statement

Paul further accused him by writing, "Josiah's established and repeated pattern of manipulation, intimidation, jealousy, slander, anger, lying, and division is seriously concerning."

Paul went on to imply that Josiah is a source of dissension and difficulties and a cause of division by writing, "Romans 16:17-18 (AMPC) instructs us to "be on your guard concerning those who create dissensions and difficulties and cause divisions, in opposition to the doctrine which you have been taught. [I warn you to turn aside from them, to] avoid them. For such persons do not serve our Lord Christ but their own appetites and base desires, and by ingratiating and flattering speech, they beguile the hearts of the unsuspecting and simpleminded."

Paul explicitly linked this passage to both Josiah and Jennifer writing, "Josiah, along with his wife, Jennifer Johnson, have deceived and divided many innocent and unsuspecting people and families by their flattering speech and cunning behavior. Full of envy and malice, Josiah has appointed himself as the chief prosecutor of the church."

In sum, at your behest and with your cooperation and participation, Paul, and subsequently you, have accused both Josiah and Jennifer of misconduct in the course of their ministry.

The only evidence of which you or Paul have personal knowledge that Paul proffered to support the libel of Josiah and Jennifer is a truncated text exchange concerning the decision to publish information regarding your father's cancer diagnosis to the public via social media, and the attendant profanity contained therein.

As you well know, nothing in that exchange indicates that either Josiah or Jennifer is a source of dissension, difficulty, or division, nor that they oppose Church teaching regarding or in relation to any specific church or the Church generally. At most, the exchange shows intemperate word choice in a private family dispute and does not substantiate the alleged victimization of innocent congregants by Josiah or Jennifer in a ministerial capacity. Critically, Jennifer is not a party to the discussion at all, yet she is in no way exempt from your defamatory censure.

Paul further alleges, and you amplified on social media, that "I spoke with six additional pastors (all in different states) who readily confirmed they have also witnessed unhealthy and ungodly behavior in Josiah and Jenn and they encouraged me in compiling this document so unsuspecting people could be *warned to avoid* them." As you well know, Paul solicited information from a variety of people concerning Josiah and Jennifer under the false pretense that he would use it for

private correction rather than public castigation. You also know full well that one of those pastors, Greg Crawford, retracted his statements concerning the Johnsons, and Paul has stealthily edited the statement to remove his information but left no clarification or correction so as not to diminish the credibility of his broader statement.

Paul also falsely claims, and you amplified the message, that "none of these people personally know each other and they have not spoken to each other in regard to this document." A statement which is demonstrably false. Specifically, Elizabeth Heller moved to Alabama from Riley Shelton's Church. Similarly, Greg Crawford and Alexa Paulsen not only know each other, they were introduced to each other by Josiah. Alexa knows the elders at Heart of the Father where she was formerly a member.

Paul asserts that the "list of godly character qualifications in 1 Timothy 3:1-7 and Titus 1:5-9 clearly disqualifies Josiah from being a leader in the body of Christ. His life and character are far from being "above reproach", his home is managed poorly, his children are completely out of control, his public reputation is marred, he often lacks any self-control, and he is entirely pugnacious, a bully and violent aggressor prone to quarrel and quick to fight." You know full well that Josiah's children are no more or less well behaved than most and you further know that Josiah is not violent and does not engage in "fights" or other physical confrontations.

Elizabeth Heller

Regarding the statements you chose to publish you knowingly omitted the materially relevant context that sheds exculpatory light on Josiah and Jennifer's conduct. These omissions are most egregious in your leading statement from Elizabeth Heller where she accuses Josiah and Jennifer of attempting to destroy her marriage but neglects to mention that her husband had been physically and spiritually abusive to her and their children for years and routinely accused her of "worshiping Satan." You also omitted the fact that Elizabeth Heller called the police in Orange Beach and sought a protective order against her husband, for the third time, on police advice, not on the advice of Jennifer or Josiah.

Barry Nichols, David Vespa, Brandon Jenkins, the Elders of Heart of the Father Ministry in Lakeland, Florida.

As you are aware, the defamatory article that you circulated includes a series of events concerning the Elders of Heart of the Father Ministry and their experience with Josiah. However, you are aware that these allegations are false, and that these same individuals have observed you lying on multiple occasions and discussed this shortcoming with Paul.

You know the omitted fact that in January 2016, you and Paul had a falling out over a false prophecy that Paul called you out on and thereby ruptured your relationship for a period of years.

You are also aware of the omitted fact that these same elders refused to allow you to attend Heart of the Father Ministry for a period of three years over the revelation of your false prophecy.

Riley Shelton, Senior Pastor of The Way Church in Hartwell Georgia

The allegations raised by Riley Shelton revolve around Josiah and Jennifer Johnson's introduction of Elijah McCurley to Jennifer's sister Allison and the subsequent marriage between the two of them. Shelton laments the severance of the relationship between Elijah and his mother and sister over the marriage, however, Elijah is happily married, and Josiah and Jennifer cannot be credibly accused of any sort of ministerial misconduct for setting up a relationship that has proven to be enduring and successful. Elijah and Allison have made a public video rebutting Shelton's false narrative. Tellingly, you have refused to acknowledge the McCurleys' efforts to correct the record by Paul's refusal to communicate with them and get their side of the story.

Joe Sweet, Senior Pastor at Shekinah Worship Center Lancaster, California.

Joe Sweet's statement omits the crux of the dispute between Josiah and Sweet. Sweet never mentions that on Josiah's first day on the job Sweet took Josiah into his office and bluntly stated that his wife Melinda was the "Number 1 enemy of his ministry" and a "true Jezabel that he couldn't trust." Omitted from Sweet's statement is the source of the disagreement between Sweet and Melinda and the sticking point that ultimately destroyed the relationship between Josiah and Sweet. Specifically, Sweet allowed a convicted pedophile, his oldest son, Elijah Sweet⁶, to attend church and date a member of the congregation with young children, over the objections of Melinda and to the horror of Josiah and Jennifer.

Thus, to the extent Josiah and Jennifer raised any "dissension" it was wholly justified by their desire to protect children and appalled at the extraordinary recklessness

⁶ Note well: Elijah Sweet is no relation, nor should he be confused with Elijah McCurley.

exhibited by Sweet via his cavalier attitude toward allowing a pedophile free reign within his congregation.

Alexa Paulsen, Director of Worship Yasha Ministry in Sioux City, Iowa.

Alexa Paulsen's statement omits the critical context that Josiah and Alexa's mother reconciled years ago, and she declined to provide defamatory material to you on request. Nor did you mention that Alexa attended university with you and Jeremiah and formerly attended Jeremiah's church HOTFM in Lakeland, Florida. She also knows several of the elders at HOTFM, contrary to your statement.

Texas Law of Defamation

Defamation Per Se and Per Quod

Defamation is the invasion of a person's interest in her reputation and good name. *Hancock v. Variyam*, 400 S.W.3d 59, 63 (Tex. 2013). The elements of defamation include: (1) the publication of a false statement of fact to a third party; (2) that was defamatory concerning the plaintiff; (3) with the requisite degree of fault; and (4) damages, in some cases. *In re Lipsky*, 460 S.W.3d 579, 593 (Tex. 2015). Negligence is sufficient to create liability for private figures. *WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568, 570 (Tex. 1998). Negligence is established upon a showing that the publisher knew or should have known that the defamatory statement was false. *HDG, Ltd. v. Blaschke*, 2020 WL 1809140 (Tex. App.—Houston [14th Dist.] Apr. 9, 2020).

The Texas Supreme Court has also defined the relationship between differing types of defamation and recoverable damages:

The common law distinguishes defamation claims as either *per se* or *per quod*. Defamation *per se* refers to statements that are so obviously harmful that general damages, such as mental anguish and loss of reputation, are presumed. Defamation *per quod* is defamation that is not actionable *per se*. Defamation *per se* is itself broken down into separate categories of falsehoods. Accusing someone of a crime, of having a foul or loathsome disease, or of engaging in serious sexual misconduct are examples of defamation *per se*. Remarks that adversely reflect on a person's fitness to conduct his or her business or trade are also deemed defamatory *per se*.

WFAA-TV, Inc.. at 596 (citations omitted).

Defamation by Implication

In a defamation-by-implication case, the defamatory meaning arises from the statement's text, implicitly. *Dallas Morning News, Inc. v. Tatum*, 554 S.W.3d 614, 627 (Tex. 2018).

In a defamation-by-implication claim, "a plaintiff can bring a claim for defamation when discrete facts, literally or substantially true, are published in such a way that they create a substantially false and defamatory impression by omitting material facts or juxtaposing facts in a misleading way." *Id.* at 627 (*Citing Turner v. KTRK Television, Inc.* 38 S.W.3d at 115).

The Texas Supreme Court summarized defamation-by-implication as a cause of action stipulating that, "a defendant may be liable for a 'publication that gets the details right but fails to put them in the proper context and thereby gets the story's 'gist' wrong." *Dall. Morning News, Inc.*, 554 S.W.3d at 627.

Under *Musser v. Smith Protective Services, Inc.,* the standard for construing defamatory meaning, generally, is whether the publication is "reasonably capable" of defamatory meaning. 723 S.W.2d at 655.

When the plaintiff claims defamation-by-implication, the judicial task is to determine whether the meaning the plaintiff alleges arises from an objectively reasonable reading. *See New Times, Inc. v. Isaacks*, 146 S.W.3d 144, 157 (Tex. 2004). (explaining that "the hypothetical reasonable reader" is the standard by which to judge a publication's meaning).

In an implication case, the judicial role is not to map out every single implication that a publication is capable of supporting. Rather, the judge's task is to determine whether the implication the plaintiff alleges is among the implications that the objectively reasonable reader would draw. *Dall. Morning News, Inc.* 554 S.W.3d at 631.

The Texas Supreme Court has held that "a plaintiff who seeks to recover based on a defamatory implication—whether a gist or a discrete implication—must point to 'additional, affirmative evidence' within the publication itself that suggests the defendant 'intends or endorses the defamatory inference." *Id.* at 635 (citations omitted).

Defamation by Inuendo

Innuendo is the extrinsic evidence required in a defamation *per quod* action. Defamation by innuendo occurs when statements do not directly defame a person, but instead, imply defamatory conduct. *Young v. Griffin,* 1998 Tex. App. LEXIS 4560, *6 (Tex. App. Dallas 1998).

Defamatory statements need not name the plaintiff if those who know and are acquainted with the plaintiff understand the statement refers to him. *Galveston Co. Fair & Rodeo v. Glover*, 880 S.W.2d 112, 119 (Tex. App.— Texarkana 1994, no writ).

Texas employs a legal test to determine whether a statement is defamatory by innuendo, looking as to how the statement would be construed by the average reasonable person, or by the general public. *See Simmons v. Ware*, 920 S.W.2d 438, 451 (Tex. App. Amarillo 1996).

Damages for Defamation

There are three types of damages that may be at issue in defamation per se proceedings: (1) nominal damages; (2) actual or compensatory damages; and (3) exemplary damages. Plaintiffs can seek general damages that includes damages for loss of reputation and mental anguish. *Miranda v. Byles*, 390 S.W.3d 543, 555–556 (Tex. App.—Houston [1st Dist.] 2012, pet. denied).

Given the perennial nature of your campaign of defamation against my clients and the *per se* nature of your false statements, they are entitled to damages for loss of reputation, mental anguish, compensatory damages, and exemplary damages.

Demand for a Correction, Clarification, or Retraction

On behalf of the Johnsons, I demand this retraction under the Texas Defamation Mitigation Act, Tex. Civ. Prac. & Rem. Code §§ 73.051-73.062.

YOU MUST IMMEDIATELY STOP DEFAMING JOSIAH JOHNSON AND JENNIFER JOHNSON

Your actions constitute defamation and a clear violation of my client's rights. I demand that you retract all defamatory statements made about the Johnsons in writing and publicly admit that you wrongfully attacked Josiah and Jennifer's characters.

In addition, I demand you send written assurance that you will make no such statements again. Lastly, I demand reimbursement for the damage you caused from defamation in the amount of **\$10,000.00** due to the injury to Josiah and Jennifer Johnson's reputation and relationships and **\$3000.00** in attorney fees necessary to uncover this information and make this demand.

Make a check payable to Josiah and Jennifer Johnson for \$10,000.00, which will pay a token of the damages suffered and \$3,000.00 in attorney fees. Mail the check and written assurance to the address of the undersigned below within 30 days of receiving this letter.

If you continue defaming my client and do not abide by these demands, I will encourage my client to file suit against you for defamation and tortious interference with business relationships. If you do not meet these demands within thirty days of receipt of this letter, I will advise my client to proceed with legal action against you without further notice.

Regards,

War U.M.

Warren V. Norred NORRED LAW, PLLC 515 E. Border St Arlington, Texas 76010 (Office) (817) 704-3984 (Fax) (817) 524-6686

Attachments:

Demand to Preserve Evidence

DEMAND TO PRESERVE EVIDENCE - TANGIBLE AND ELECTRONIC

Now that you are on notice of the claims against you, you are under an obligation to preserve all tangible and electronic evidence related to such claims and damages or face sanctions in litigation for spoliation of such evidence. As used in this document, "you" and "your" refers to you, your agents, and those working in concert with you.

"Specifically, we observed in *Wal-Mart Stores* that [the duty to preserve evidence] arises only when a party knows or reasonably should know that there is a substantial chance that a claim will be filed and that evidence in its possession or control will be material and relevant to that claim." *Brookshire Bros., Ltd. v. Aldridge*, 438 S.W.3d 9, 20 (Tex. 2014) (Internal quotations omitted). You should anticipate that much of the information subject to disclosure or responsive to discovery in this cause is stored as tangible documents and Electronically Stored Information (hereinafter "ESI"). These terms should be afforded the broadest possible meaning. *You are obliged to preserve potentially relevant evidence even if you do not anticipate producing such evidence*.

Preservation Requires Immediate Intervention - You must act immediately to preserve potentially relevant evidence, including ESI, created or modified date on or after January 01, 2024, through the date of this demand, concerning the matters at issue, described above.

Adequate preservation of evidence requires more than simply refraining from efforts to destroy or dispose of such evidence. You must intervene to prevent loss due to routine operations, including routine ESI and document disposal, or malfeasance and preserve such evidence. This demand includes a requirement to act to preserve evidence that may be accessed by others subject to your direction or control. Evidence must be preserved in its native form, including ESI. As hard copies do not preserve electronic searchability or metadata, they are not an adequate substitute for, or cumulative of, electronically stored versions.

If you have any questions about your duties concerning these matters, please HAVE YOUR ATTORNEY, contact my office at 817-704-3984.

Thank you,

Warren V. Norred