

# Exhibit B

## **SWORN AFFIDAVIT**

**STATE OF:** Georgia  
**COUNTY OF:** Gwinnett

I, **Richard Edwin Youngblood**, being duly sworn, depose and state as follows:

**Personal Background:**

- a. I am a 62-year-old male, currently residing in the State of Georgia, County of Gwinnett.
- b. I have personal knowledge of the facts and circumstances detailed in this affidavit, and I am competent to testify to these matters if called upon to do so.

**Purpose of Affidavit:**

I am providing this sworn affidavit to present my knowledge regarding the claims raised by Duane Youngblood concerning Bishop T.D. Jakes. This document is based on my direct observations, experiences, and any relevant facts within my knowledge.

**Personal Interaction with Duane Youngblood concerning T. D. Jakes:**

In the fall of 1990, I spoke with Duane Youngblood on the phone about a personal matter between Elder T. D. Jakes and I. After sharing with him what had happened to me, he began to tell me of an interaction he'd had with Jakes. He told me that he had gone over to the home of Sister Giles to visit with Elder Jakes. After speaking with him about his life and some of the things that had gone on in it, Duane said that he noticed that it was getting late and had to leave. As he got up from his chair to leave, Jakes met him and tried to kiss him. He expressed how awkward, stunned and uncomfortable it made him feel. He then shared that he had received a call from Elder Jakes the following day. This call sounded as though Jakes was taking a bath when he proposed to take care of Duane financially if he had sex with him when he was in Pittsburgh for preaching engagements. We both expressed how absolutely astonished we were concerning our experiences with Elder Jakes. Over the years since, we have discussed this matter several other times as we've reflected on our past.

**Personal Experience with Bishop Thomas Dexter Jakes, aka T.D. Jakes:**

My personal experience with Bishop T.D. Jakes is as follows:

On or about, the spring of 1986, I was a young minister who was hungering after God. I was in the midst of a personal time of prayer and fasting concerning my desire for someone to help me reach my full potential. I remember praying these words, "Lord I feel like Joshua, I need a Moses in my life." It was at this point that my father tells me about Elder T.D. Jakes who was the guest speaker at The Refuge Temple Church in Penn Hills Pa. The Pastor at that time was Elder Rawling (sp). This weeklong event began every night at around 8 p.m. I decided to attend to see if what my father had said was true. To my amazement, he was absolutely correct in my opinion.

Elder Jakes had a powerful and revelatory way in which he preached. I remember thinking that he ability to put into words many of the things that I thought but could not articulate. I attended each night being encouraged both by his preaching style and his perspective on the scriptures. On one of the nights of this revival, Jakes mentioned that he would be heading home to West Virginia for the weekend to his home church but returning to Pittsburgh at another church the following week. Following one of the services that week, I asked Elder Jakes if I could drive him to his church in West Virginia since he was returning the following week. To my shock, he said yes. That weekend, I was a guest in his home where I met his wife and their two sons. That Sunday, we went to a town called Smithers where The Temple of Faith resided. Elder Jakes told me that it was a former theater that had been condemned. They purchased it and were renovating it. The church service that Sunday was another phenomenal experience. The following day, we headed back to Pittsburgh for his second week of services. On the drive back, Elder Jakes says to me, Brother Youngblood, I've got some good brothers at my church but in many ways, I feel like Moses looking for Joshua. This statement sounded like a direct answer to the prayer I had prayed just days ago. I took this as a sign that I had found the right person to help me reach my potential in ministry. I had a later conversation with him where I let him know of my intentions to relocate to West Virginia so that I could sit under his tutelage. At that time, I was a husband and father, so I had to share all this with my wife and family. My wife offers no resistance to my desire to relocate. We packed our house and all our belongings and moved to Charleston WV. We pulled up in front of Elder Jakes' house following what I believed was going to be the best move of my life and young ministry. As I began to integrate myself into The Temple of Faith, I am given responsibilities to both the church as well as to Elder Jakes and family. I am eventually given the responsibility as his armorbearer. In position, I assisted him with a variety of things such as driving, carrying the items he needed for preaching (i.e. his bible or robe) traveling with him as my schedule allowed to other cities as well as being available throughout the day if he needed my assistance in some matter. It was during this time that I also became the Praise and Worship Leader. All of this happened within a two-year period of time. During this time my wife and I have our son. He was born in June of 1987. This is my landmark of when things started to become weird. The conversations Jakes started to have with me had shifted from ministry and God to more things about him. He shared an uncomfortable story about how he taught his wife to have oral sex with him. There were other uncomfortable things he said which I tried very hard to put into perspective so that it would make sense for me. He continued his travels around the country, some without me and others when I accompanied him. I

recall one trip to a city called Ligo in West Virginia. He told me that it was a church that handled snakes, but they had agreed not to handle them on this particular Sunday. We joked about where we would have run if they had brought them out. This was just one of the many trips and conversations we had to this point. At this time, The Temple of Faith was a part of a larger organization named Greater Emmanuel Apostolic Faith Tabernacle Inc (GEAFT). Elder Jakes had been promoted to the National Evangelists which required travel to the other churches in the fellowship. In 1988, Elder Jakes is made a Bishop. He shared with me a conversation that he had with the then Chief Apostle on how to not only make him a Bishop but to make him head of the diocese by moving the two men ahead of him out of the way. So, he is now a Bishop with greater responsibilities, greater authority and greater respect. During that year, there is a mandatory meeting that he had to attend in Pittsburgh Pa. He asked me to accompany him as his driver which was I was happy to do because I would get the opportunity to visit with my Parents and siblings. He decided that we would head there a day early which meant we had to get a hotel for the night. We stopped at what I believe was an EconoLodge in Westover WV. He secured a room with two beds in it, and we went to the room for the night. That night, while I was laying in my bed, I felt Elder Jakes climb into my bed. He pressed his body against mine and asked, "Youngblood, do you feel that?" He was referencing his erection that he was pressing against my back side. I got up out of bed in complete shock as he also got up from the opposite side and met me. He grabbed me by my arms and pulled me to him and started trying to kiss me. At this point I cannot believe what is happening to me. I had moved my family, following this man around the country and in this hotel, I am being introduced to what amounted to a Groomer. I thought about everything he had said or done and now it started looking like a plot. I was somehow able to make it through the night with no further interaction along that line and the following day, we continued our trip to Pittsburgh. On our way back after the meeting, I brought up what happened and expressed my extreme discomfort and that I loved my wife. His response was a slight grunt something like "hmmm" to which I asked what that meant and he responded that it kind of hurt his feeling to hear me say that. I am now more confused than ever about what I have gotten myself and my family into. The following week at church, I am not the same. The life-changing event in that Hotel in Westover had left me trying to make sense of things. I decided to share what happened in that hotel with one of the elders in the church named Silas Wheeler. I told him everything that happened in that EconoLodge in Westover WV. I was looking for someone to help me make sense of this, but I would find out that Silas was not that person. He immediately went to Bishop Jakes and told him

what I had shared. Jakes subsequently calls me into his office where he berates me for sharing what happened. He says, "It was like Wheeler was in the hotel with a camera." He then says "You didn't care about my wife" to suggest she may find out his secret. At this point, I am not only confused but I feel betrayed by Silas Wheeler. There was one other minister who share a duplex with us that I felt close to, so I decided to ask him if Jakes had ever tried anything sexually with him to which he responded, "I've never been woke up with nothing like that." This began the internal conversation within me concerning what I must've done to make Bishop Jakes think that I was gay.

Eventually, he told me that I could no longer attend his church, called my wife, told her that I was a liar and to beware of me and also that even though I was no longer allowed to attend the church, she could. I called him after being told this from my wife and shared some choice words. From that day until recent years, I have had mental and spiritual anguish as I was left to bear such a burden as the secret of Jakes' sexuality and the way in which I found out. It's been 39 years of my life, my now ex-wife and our children, products of a broken home and our faith crushed to pieces. All because I simply wanted someone to help me become my best self. I was totally and completely deceived by Thomas Dexter Jakes. (T.D. Jakes)

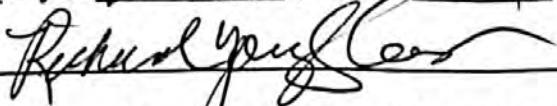
These experiences have shaped my understanding and perspective on the claims raised by Duane Youngblood.

**Affirmation of Truthfulness:**

I affirm that the statements contained in this affidavit are true, accurate, and complete to the best of my knowledge, information, and belief.

**FURTHER AFFIANT SAYETH NOT:**

Dated: this 3<sup>rd</sup> day of December (Month), 2024 (Year).

Signature of Affiant: 

**Acknowledgment and Notarization**

STATE OF: Georgia  
COUNTY OF: GWINNETT

Subscribed and sworn to (or affirmed) before me by RICHARD YOUNGBLON (Name of affiant),  
this 3<sup>rd</sup> day of Dec (Month), 2024 (Year).

Notary Public:

Amir Ali  
Notary's Printed Name

Amir  
Signature

My Commission Expires: 04-25-2028

Seal:

