

IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF IOWA CENTRAL DIVISION

CHRIST APOSTOLIC TEMPLE, INC.,
DWIGHT REED, and JORDAN REED,

Plaintiffs,

vs.

DEMETRIUS SINEGAL, THE
KINGDOM CHURCH, and SAFEHOUSE
#UNMUZZLED,

Defendants.

No. 4:22-cv-00303-JEG-HCA

DEFENDANTS' ANSWER
AND AFFIRMATIVE
DEFENSES

COMES NOW the Defendants, The Bishop Demetrius Sinegal, the Kingdom Church, and Safehouse Unmuzzled, Inc. through their attorney Amanda T. Adams, and in support of this Answer and Affirmative Defenses to Plaintiffs' Complaint, state as follows:

INTRODUCTION

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

RESPONSE: While Defendants DENY Plaintiffs are entitled to damages, they ADMIT the amount alleged in controversy adequately complies with diversity jurisdictional requirements for federal court.

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

RESPONSE: Paragraph 2 is a jury demand to which no answer is required.

PARTIES AND JURISDICTION

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

RESPONSE: Defendants have no personal knowledge of whether The Temple is properly registered as a non-profit, and neither admit nor deny due to lack of information. Defendants ADMIT said organization is in Des Moines, Polk County, Iowa. Defendants ADMIT the Temple is a religious institution.

4. **ALLEGATION:** Bishop Reed is a bishop consecrated in the Apostolic faith and was selected to serve as the Temple's pastor by unanimous vote of the Temple in December 2017. Bishop Reed succeeded his father, Bishop Jeremiah Reed.

RESPONSE: Defendants ADMIT that Dwight Reed is considered a bishop in the Apostolic faith and that he was selected to serve as the Temple's pastor in 2017. Defendants ADMIT Mr. Dwight Reed succeeded his father, Bishop Jeremiah Reed. Bishop Sinegal is not aware of whether Mr. Dwight Reed is "consecrated" within the meaning of the denomination and therefore DENIES that allegation.

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

RESPONSE: Defendants ADMIT that two of the Plaintiffs are married, but DENY that the origin of their relationship was legal, ethical, or appropriate.

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

RESPONSE: Defendants ADMIT that Bishop Demetrius Sinegal is a pastor in the apostolic faith

and that he resides in Texas. Defendants also ADMIT that Bishop Demetrius Sinegal travels with speaking engagements, but DENIES he has a “fund-raising” machine, which implies he is personally profiting in an inappropriate manner. Defendants affirmatively state that all of Bishop Sinegal’s actions were in his individual capacity and not as pastor or agent of The Kingdom Church. Defendants affirmatively state that at all relevant times, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

7. ALLEGATION: The Kingdom Church is a religious organization with a principal place of business in Missouri City, Texas.

RESPONSE: Defendants ADMIT the Kingdom Church is a religious organization with a principal place of business in Missouri City, Texas.

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

RESPONSE: Defendants admit that Sinegal is the authorized agent for The Kingdom Church. Defendants DENY that Bishop Sinegal was acting in his pastoral capacity or his agency of The Kingdom Church associated with his activities concerning protection of victims of clergy abuse. Defendants affirmatively state that at all relevant times, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY that Plaintiffs have suffered damages and affirmatively state that this fallacious lawsuit has caused the Defendants damages but ADMIT that the alleged damages exceed the jurisdictional limits for federal court.

10. ALLEGATION: Jurisdiction is conferred upon this Court pursuant to Iowa Code §602.6101.

RESPONSE: Defendants ADMIT that the Iowa Court has potential jurisdiction but DENY that federal court is not an appropriate forum for these matters.

11. ALLEGATION: Venue is conferred pursuant to Iowa Code §616.18.

RESPONSE: The statute speaks for itself, and the Defendants ADMIT that the Plaintiffs reside in Polk County, Iowa.

BACKGROUND

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

RESPONSE: Defendants do not have specific knowledge of when the Temple was founded, or whether it is the largest predominately African American church in the State of Iowa, or the number of members it has, and therefore neither admit or deny due to lack of information.

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

RESPONSE: The allegations in paragraph 13 are irrelevant to the question about whether the Defendants have engaged in wrongful tortious conduct against the Plaintiffs. Affirmatively state they have no specific, personal knowledge of these facts, and therefore neither admit nor deny due to lack of information.

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

RESPONSE: The allegations in paragraph 14 are irrelevant to the question about whether the Defendants have engaged in wrongful tortious conduct against the Plaintiffs. Affirmatively state they have no specific, personal knowledge of these facts, and therefore neither admit nor deny due to lack of information.

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

RESPONSE: The allegations in paragraph 15 are irrelevant to the question about whether the Defendants have engaged in wrongful tortious conduct against the Plaintiffs. Affirmatively state they have no specific, personal knowledge of these facts, and therefore neither admit nor deny due to lack of information.

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

RESPONSE: The allegations in paragraph 16 are irrelevant to the question about whether the Defendants have engaged in wrongful tortious conduct against the Plaintiffs. Defendants affirmatively state they have no specific, personal knowledge of these facts, but state that at one time Christ Apostolic Temple's past publication named Mr. Dwight Reed as dean of the school. The Defendants Safehouse #Unmuzzled and Bishop Sinegal affirmatively state that in all relevant times

Mr. Dwight Reed was acting as pastor and dean of the school. The Kingdom Church makes no allegations whatsoever, except to deny that it has made statements about any of the Plaintiffs.

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

RESPONSE: The Defendants Safehouse #Unmuzzled and Bishop Demetrius Sinegal, have not made specific allegations about physical sexual contact between the plaintiffs or when a pregnancy began. They have concerns about the inappropriately personal and romantic relationship between a pastor, counselor, and educator with a member of his congregation and the student. The Plaintiff's daughter made some allegations about a premarital pregnancy, but Bishop Sinegal and Safehouse #Unmuzzled have no specific knowledge of if/when sexual conduct took place, and affirmatively state they have made no statements regarding the timing of sexual relations or lack thereof. The Kingdom Church makes no allegations whatsoever, except to deny that it has made statements about any of the Plaintiffs. Affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

18. ALLEGATION: There is a 43-year age difference between Bishop Reed and Mrs. Reed.

RESPONSE: The Defendants ADMIT the allegations.

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

RESPONSE: The Defendants DENY that Bishop Sinegal spearheaded an effort to smear Mr. Dwight Reed, in that the allegations are false. The Defendants further DENY that Bishop Sinegal was acting in his agent capacity of The Kingdom Church and his agency while making the allegations, regardless of their truthfulness or falsity. Affirmatively state that at all times relevant

herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants affirmatively state any public statements made by Bishop Sinegal constitute the truth and/or reasonable inferences after an appropriate investigation. They also DENY that Bishop Sinegal untruthfully “attacked” the Plaintiffs through said media and social media sites, and that Bishop Sinegal did so while acting as Pastor or Agent of The Kingdom Church. Affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

21. ALLEGATION: Sinegal’s attacks include Facebook posts made on March 14, twice on March 16, March 20, twice on March 22, twice on March 24, March 25, March 28, March 30, April 4, and April 6, 2022. Sinegal’s Facebook account lists 11,000 followers and the posts in question often times show they have been shared many times, often at Sinegal’s request. Sinegal’s Facebook page also provides “followers” multiple convenient ways to financial contribute to him and Kingdom Church through Cashapp, through text message and through a secured online giving portal with convenient suggested donation amounts ranging from \$10 to \$2,500 per donation. These Facebook posts have been shared over other social media with some having been viewed over 34,000 times.

RESPONSE: The Defendants DENY that Bishop Sinegal made false statements on the Plaintiffs, but nevertheless ADMIT he has used social media to communicate and that the posts have been re-shared. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse

#Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal made false statements about the Plaintiffs on Youtube videos posted on the aforementioned dates, but ADMIT he has used said platform to communicate. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal has made false statements about the Plaintiffs, but ADMIT that Bishop Sinegal has used podcasts. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal has made false statements the Plaintiffs, but ADMIT he has communicated on a forum called Clubhouse. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not

separate from it.

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

RESPONSE: The Defendants ADMIT the allegations but DENY that the request to investigate Mr. Dwight Reed was based on false allegations. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal has engaged in factually false statements, but ADMIT he requests viewers/listeners to share his comments. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal’s statements are false, but ADMIT the allegations as to the Register’s circulation statistics. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in

his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

28. ALLEGATION: Sinegal has further promoted his speaking engagement in Des Moines, Iowa planned for April 13 where he will continue his attacks on plaintiffs.

RESPONSE: The Defendants ADMIT that Bishop Sinegal had a speaking engagement in Des Moines, Iowa on or about April 13, 2022, but denies his concerns addressing the Plaintiffs are based on something factually false. Defendants affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants Safehouse #Unmuzzled and Bishop Sinegal DENY they received a cease and desist notice on March 23, 2022, but ADMIT the Church received an email from the Plaintiffs' counsel around that time. The Church denies it was a party to any of Bishop Sinegal or Safehouse #Unmuzzled's activities. Further, Safehouse #Unmuzzled and Bishop Sinegal DENY that said criticisms of the Plaintiffs are false, and affirmatively state and/or they are matters of opinion, and/or reasonable inference.

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

- a. claims Bishop Reed is a "child predator";
- b. claims Bishop Reed "used his power as pastor to groom a teenager";
- c. claiming Bishop Reed as "misused his pastoral power";
- d. refers to Bishop Reed by saying "the children of darkness are very cunning";

- e. claims Bishop Reed has “no ethics” and “no integrity”;
- f. claims Bishop Reed is “wicked”;
- g. claims Bishop Reed has engaged in a “perverse use of the pulpit”;
- h. claims Mrs. Reed is a “victim” and did not marry of her own free will;
- i. claims there is “nothing safe about” the Temple;
- j. claims Bishop Reed was “after [Mrs. Reed] since she was 15 years of age”;
- k. claims the Temple is a “cult”;
- l. claims Bishop Reed is a “shepherd that has starved his flock to feed himself”;
- m. claims Bishop Reed should be “purged” and “put out of that church”;
- n. claims the Temple is “co-signing wickedness”;
- o. compared Bishop Reed to musician and convicted sex offender R. Kelly and Mrs. Reed to one of R. Kelly’s victims;
- p. claims Bishop Reed was the dean of the school Mrs. Reed graduated from, her “counselor” and “this is what grooming looks like”;
- q. claims Bishop Reed is a “warlock” and has people in the Temple “praying witchcraft prayers”;
- r. claims the Temple has an “abusive culture”; and
- s. claims Bishop Reed has engaged in “clergy abuse”;
- t. claims Bishop Reed stole family property;
- u. claims Bishop Reed provided funding for GG’s Chicken and Waffles (a restaurant owned by Mrs. Reed’s relatives) so he could have permission to marry Mrs. Reed; and
- v. claims Bishop Reed had Mrs. Reed’s mother put in a mental hospital the week of the wedding to allow wedding to proceed.

RESPONSE: The Defendants ADMIT that Bishop Sinegal has made such statements, except for

the following:

A. **J**, [Bishop Sinegal believes Ms. Reed acted as a student/adolescent at the Christian Academy when the personal and romantic relationship with Mr. Reed began.].

B. The Defendants DENY Bishop Sinegal or Safehouse #Unmuzzled made statements- **T, U and V**, and affirmatively states other entities, not under Bishop Sinegal and/or Safehouse #Unmuzzled's control, made those statements.

C. Bishop Sinegal and Safehouse #Unmuzzled say that paragraph **P** was quoting Christ Apostolic Temple's brochure calling Dwight Reed "Dean" of the school. Bishop Sinegal DENIES he did so in his capacity as an agent of The Kingdom Church, and DENIES that they are not matters of opinion and/or factually false.

As for letter "T" Bishop Sinegal refers to Brittney Reed, the great niece of Mr. Reed, and her statements/evidence to draw that conclusion. The facts of the investigation would give rise to a reasonable conclusion/inference that an inappropriately personal relationship occurred between a pastor/educator/counselor with a student minor and congregant. Bishop Sinegal met with Mr. Reed's daughter Jasmine Reed-Vinson, Mr. Dwight Reed's nephew Jermaine Reed and other family members, who reported that the family's estate had been stolen from them. Bishop Sinegal and Safehouse #Unmuzzled met with numerous other witnesses who will be named in discovery regarding every allegation. Affirmatively state Bishop Sinegal was not acting in his capacity as pastor of The Kingdom Church when doing so. Affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

31. ALLEGATION: While Sinegal claims "he has nothing to gain from" his attacks on plaintiffs, his attacks are always linked to an easy means to financially contribute to him and Kingdom Church. In essence, he has created a maelstrom of controversy, over which he is the admitted "spearhead" and from which he is the direct financial beneficiary by funneling money to

organizations over which he has control and from which he is compensated. This financial connection to a manufactured controversy has happened before and led others to level claims that Sinegal operates as a “church snatcher, petty hustler, liar and a thief.”

RESPONSE: The Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled has made false statements for the purpose of achieving financial gain from which he is the direct beneficiary, or that he was acting in his pastoral capacity of The Kingdom Church when making any statements. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: The Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled has made false statements. The statements made are matters of opinion and affirmatively state he conducted a proper investigation. The Defendants also DENY that Bishop Sinegal was doing so in his capacity as pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

33. ALLEGATION: Sinegal’s attacks have had some of their desired effects. Plaintiffs have been regularly harassed on-line, unidentified young men have been coming to the home to harass Bishop Reed and Mrs. Reed, there has been a decline in Temple membership, a decline

in tithing, excessive and harassing phone calls, and harassing messages, and threats through messenger apps.

RESPONSE: Defendants DENY that Bishop Sinegal's statements are factually false or not matters of opinion. Defendants further DENY that the statements were made by him in his capacity as pastor of The Kingdom Church. Defendants affirmatively state ~~that~~ they lack specific information and knowledge of the public response and whether people have come to the Plaintiffs' home, whether a decline in membership or tithing has occurred, harassing phone calls have occurred, or threats and therefore DENY each and every allegation. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

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

RESPONSE: Defendants reassert the denials and other statements in the paragraphs previously stated.

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

RESPONSE: Defendants DENY that Bishop Sinegal made factually incorrect statements that were not matters of opinion, or when he did, regardless of the allegations' truthfulness or falsity, **he** was acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as

executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion, or, regardless of the allegation's truthfulness or falsity, that Bishop Sinegal was acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

39. ALLEGATION: Indeed, the purpose of preparing and publishing the statements was to

damage plaintiffs' reputations and standing within the community.

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion, or that Bishop Sinegal did so while acting in his capacity as Pastor of The Kingdom Church. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

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

RESPONSE: Defendants DENY that Bishop Sinegal or Safehouse #Unmuzzled made factually incorrect statements that were not matters of opinion, or that regardless of the allegations' truthfulness or falsity, that he was acting in his capacity as Pastor of The Kingdom Church, and

DENY that financial damages were incurred because of false statements. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

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

RESPONSE: Defendants reassert all their responses as though fully set forth herein.

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

RESPONSE: Defendants DENY that they and Bishop Sinegal engaged in false statements and defamatory comments about the Plaintiffs, or that such conduct was outrageous. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY the allegations in paragraph 44 and demand strict proof thereof. Defendants affirmatively state that at all times relevant herein, Bishop Demetrius Sinegal was acting solely in his capacity as executive director of Safehouse #Unmuzzled and not separate from it.

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

RESPONSE: Defendants DENY the allegations in paragraph 45 and demand strict proof thereof.

46. ALLEGATION: The Defendants' outrageous conduct was a proximate cause of the emotional distress.

RESPONSE: Defendants DENY the allegations in paragraph 45 and demand strict proof thereof.

47. ALLEGATION: The statements by Defendants proximately caused and continues to cause emotional distress damages.

RESPONSE: Defendants DENY the allegations in paragraph 45 and demand strict proof thereof.

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

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

RESPONSE: Defendants DENY the allegations in paragraph 45 and demand strict proof thereof.

WHEREFORE, Defendant respectfully requests the that this Honorable Court deny all relief requested in Plaintiffs' complaint, award them attorney fees for the costs, maintenance, and prosecution of this matter, and for such further, other, or different relief as this Honorable Court deems appropriate, reasonable, and just.

AFFIRMATIVE DEFENSES

TRUTH

49. Defendants reallege all of their previous statements in paragraphs 1-48 as though fully included herein.

50. Safehouse #Unmuzzled and Bishop Sinegal conducted a lengthy investigation and interviewed numerous witnesses prior to making said statements, and the allegations constitute factual matters of the truth.

OPINION

51. Defendants reallege all of their previous statements in paragraph 1-50 as though fully

included herein.

52. All or some of Bishop Sinegal and Safehouse #Unmuzzled's statements were matters of opinion and/or reasonable inference formed after a reasonable inquiry into the facts.

STANDING

53. Defendants reallege all of their previous statements in paragraphs 1-52 as though fully included herein.

54. Bishop Sinegal has not acted in his capacity as pastor of The Kingdom Church, nor has the Kingdom Church participated in his investigatory activities, and therefore has no standing to be sued as a defendant.

55. Bishop Sinegal acted solely in his capacity as executive director of Safehouse #Unmuzzled and therefore he individually has no standing to be sued as a defendant.

ALL PLAINTIFFS ARE PUBLIC FIGURES

56. Defendants reallege and reincorporate paragraphs 1-55 as paragraphs 1-55 herein.

57. Christ Apostolic Temple, Inc. is a public figure that is widely known in Iowa, Shreveport, Louisiana, and Hannibal, Missouri, as is Bishop Dwight Reed and his wife Jordan Reed. As such, the Plaintiffs must prove actual malice and reckless disregard for the truth of the matters asserted pursuant to New York Times v. Sullivan, 376 U.S. 254 (1964).

Respectfully submitted:

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