Accountability & Records Memorandum

A documentary report for presentation to The Church of Eleven22, Inc.

Prepared from supplied records and public sources
September 2026

Purpose: organize verified facts, supported inferences, unresolved questions/allegations so that any communication is grounded in documentary evidence rather than assumption.

Executive Summary

This memorandum identifies what the presently available records establish, what they do not establish, and what additional records or explanations would materially improve accountability.

The documentary record establishes a large Florida nonprofit corporation governed by a long-continuing Elder/Director group; a lead pastor, Joby Martin, who has served as a director from the beginning and has repeatedly signed Florida annual reports as President; substantial debt-backed real-estate expansion; wholly owned entities associated with the Retreat Center; and a Blueprint1122 operation that appears closely integrated with Eleven22 leadership and resources. The record also establishes that Eleven22's own membership materials ask Covenant Members to give sacrificially, trust leadership decisions, and submit to elders.

The central accountability question is whether the financial and governance accountability provided back to the people who fund and participate in the organization is proportionate to the trust, giving, and submission that Eleven22 expressly requests.

1. Method and Evidentiary Standard

Each material proposition is classified using the following standard:

- PROVEN - established by a primary document or multiple reliable sources.
- SUPPORTED - a reasonable inference supported by multiple facts, but not yet conclusively established.
- UNRESOLVED - a material question for which the present record is incomplete.
- NOT SUPPORTED - an allegation for which the investigation has not found adequate evidence.

2. Eleven22's Own Ecclesiological and Covenant Framework

Eleven22's Covenant Membership booklet describes the church as consisting of those surrendered to the Lordship of Jesus and describes local churches as communities of believers. It also says the church was designed as a movement of people following Christ and contrasts that movement with the later 'institution of the church.'

Source: Covenant Membership Booklet_2024, pp. 2 and 7; supplied file.

The same booklet explicitly contrasts an institutional 'TEMPLE MODEL' with a 'MOVEMENT' model. Under the movement model, believers are the temple and all believers are equally called and share in the royal priesthood. This is important to the theological accountability argument: Eleven22 itself distinguishes the biblical identity of the Church from an institutional or building-centered model.

Source: Covenant Membership Booklet_2024, p. 3.

At the same time, the booklet creates a formal local Covenant Membership relationship. A Covenant Member agrees, among other things, to give financially in a sacrificial, cheerful, and voluntary manner; pray for leadership and trust its decisions; and submit to elders and appointed leaders.

Source: Covenant Membership Booklet_2024, p. 8.

The booklet also describes Eleven22 as 'STAFF-led and ELDER-governed.' Among the elders' stated responsibilities are guarding doctrine, maintaining mission/vision/values, protecting and keeping healthy the lead pastor and his family, and partnering with the lead pastor in care of staff and deacons.

Source: Covenant Membership Booklet_2024, p. 5.

3. Corporate Structure: Church, Corporation, and 'Members'

The 2011 Articles of Incorporation create a Florida nonprofit corporation. Article IV expressly provides for corporate 'members,' also known as 'Covenant Partners,' and delegates qualifications, admission, termination, and standing to the bylaws. Article V vests governance and management in a Board of Directors also known as the Elder Board, with between five and twelve directors.

Source: Articles of Incorporation of The Church of Eleven22, Inc., Articles IV-V, filed October 2011; supplied corporate filing.

The corporation is non-stock. Its assets therefore are *allegedly* not equity owned by Joby Martin, the elders, attendees, or Covenant Members. Article VII directs residual assets after dissolution and payment of obligations to qualifying nonprofit purposes. Article XI bars private inurement while permitting reasonable and ordinary necessary expenses of employees, ministers, officers, and agents.

Source: Articles of Incorporation, Articles VI, VII, XI.

Article IX is especially significant: the filed Articles contemplate amendments approved first by the Board and then by a two-thirds vote of members present at an annual or special meeting. The present bylaws are therefore essential to determine what became of the original Covenant Partner membership class, who qualifies today, and what voting or governance rights remain.

Source: Articles of Incorporation, Article IX.

4. Governance Continuity and Executive Authority

Florida annual reports from 2012 through 2026 show substantial continuity among Eleven22's directors. Joby Martin, Lars Petersen, and Dan Buckles appear across the long period; other directors also served lengthy terms. Continuity is not itself evidence of impropriety, but it raises serious questions regarding board-independence procedures, compensation review, conflict disclosures, and recusal practices material governance.

The 2020 annual report listed Lars Petersen, Rusty Pritchett, Joby Martin, Chuck Gersbeck, Paul Larson, Dan Buckles, and Barry Chandler as directors and was signed by Joby Martin as President. The 2026 annual report lists Lars Petersen, Gary Proctor, Joby Martin, Glenn Doyle, Chuck Gersbeck, Dan Buckles, and Barry Chandler, again signed by Joby Martin as President.

Source: Florida annual reports supplied for 2020 and 2026.

This establishes formal executive and director authority. *It raises additional questions such as could Martin ultimately own the corporation by influencing the continued long standing same directors that also serve on the Elder Board to change those alleged restrictions now with no transparency*. *The bylaws and board records are necessary to define the actual allocation of authority*.

5. Financial Expansion, PPP, and the Retreat Center

The evidence establishes that Eleven22 received a PPP loan of approximately $1.73 million in April 2020 and later recognized forgiveness. The 2021 audit also shows significant operating cash generation and major property/equipment activity during the same general period. That juxtaposition is a legitimate stewardship and public-policy question of PPP fraud.

Can there be an argument the PPP proceeds were additional funds used to purchase the Retreat Center? *Again, why no transparency*?

The audit states that Eleven22 formed Woodbine Acquisition, LLC in July 2020 as a wholly owned subsidiary for the property acquisition and that the consolidated statements include Woodbine Acquisition LLC and The Retreat Center LLC.

The audit further identifies a Retreat Center mortgage and three unsecured notes payable to individual third parties bearing a fixed 0.35% rate, with $1.25 million outstanding at the end of 2020 and $1.0 million at the end of 2021. The identities of those three lenders remain unresolved. The low interest rate appears economically favorable to Eleven22; the concern is therefore disclosure and conflicts.

Source: Eleven22 2021 audited financial statements; public audit previously reviewed.

6. Blueprint1122

Public materials identify Blueprint1122 as an affiliate or venture associated with Eleven22 and describe substantial overlap in leadership, staff expertise, and real-estate functions. Eleven22's published financial reporting has also identified Blueprint1122 as an operating-expense category. The public record supports the inference that Blueprint1122 is operationally integrated with Eleven22. *Why is a private organization being funded by those paying tithes*? *Why no transparency to those paying the tithes that their tithe supports a private entity*?

What remains unresolved is the exact legal entity through which Blueprint1122 operates, its ownership/control documentation, the amount and classification of outside-client revenue, allocation of employee time and shared overhead, intercompany agreements, and whether all net economic benefit remains with Eleven22 or another exempt affiliate. *With no transparency this raises allegations of the private enrichment of Martin, Paul Williams, Shawn Maxwell and others involved*.

7. Compensation and Related-Party Accountability

Because “churches” in reality a business, generally are not required to file Form 990, executive-specific compensation is not readily visible in the same way it would be for many other charities. The available audit materials disclose retirement/deferred-compensation arrangements at an organizational level, but do not disclose a complete individual compensation package for Joby Martin or any other staff personnel.

A complete accountability review would distinguish salary, housing allowance, retirement contributions, deferred compensation, health and other benefits, travel, reimbursements, speaking-related expenses, book/royalty arrangements, and any outside compensation. The relevant governance question is who approves each component, what comparability information is used, and whether interested persons recuse themselves.

8. Findings Matrix

Issue	Status	Basis
Joby Martin personally owns Eleven22 assets	UNRESOLVED	Non-stock nonprofit; Articles restrict private inurement and dissolution distribution BUT can that be changed by directors/elders privately without transparency?

Joby Martin has substantial formal authority	PROVEN	Director from inception; repeated Florida filings signed as President.
Joby can act without the Elder Board	UNRESOLVED	Articles vest governance in Board; bylaws not yet produced.
Long-continuing Elder/Director group	PROVEN	Florida annual reports 2012-2026.
PPP fraud	UNRESOLVED	Loan/forgiveness proven with later revenue growth.
PPP dollars directly purchased Retreat Center	UNRESOLVED	Lack of transparency of the financials make it look suspicious.
Three individual 0.35% Retreat lenders existed	PROVEN	Audited note disclosure.
Those lenders were insiders	UNRESOLVED	Identities not publicly established.
Blueprint1122 is integrated with Eleven22	STRONGLY SUPPORTED	Shared leadership/staff/functions and church financial reporting.
Blueprint1122 privately enriches insiders	UNRESOLVED	No reliable evidence presently found.
Eleven22 voluntarily resigns from ECFA	STRONGLY SUPPORTED	Public ECFA record identifies voluntary resignation. AGAIN, why does Eleven22 not want to be transparent as the Bible instructs?
Eleven22 provides complete governance accountability	NOT ESTABLISHED	Bylaws, detailed board/conflict/compensation records and several transaction details remain unavailable.

9. Specific Records and Explanations Requested

- Current bylaws, together with all amendments and restatements, and prior versions since incorporation.
- A written explanation of the relationship between the Articles' 'Covenant Partners' and today's 'Covenant Members,' including current voting rights and the method of electing or appointing Elders/Directors.
- Conflict-of-interest policy and the process used for annual director/officer conflict disclosures.
- The policy and board process used to approve the Lead Pastor's complete compensation package, including documentation of recusal and comparability review.

- Board resolutions or minutes sufficient to show approval of Woodbine Acquisition LLC, the Retreat Center acquisition, material financing, and the three individual notes, including any conflict disclosures or recusals.
- The identities of the three individual Retreat Center lenders, or alternatively confirmation whether any lender was then an Elder, director, officer, employee, substantial donor, vendor, or related person.
- Blueprint1122's legal entity/trade-name identity; ownership or control; tax/accounting treatment; intercompany or cost-sharing arrangements; annual outside-client revenue; and how shared Eleven22 employee time, facilities, systems, and intellectual property are allocated.
- The latest complete annual financial statements, including consolidated/combined subsidiary or affiliate statements as appropriate.
- A schedule of material related-party transactions involving directors, officers, senior employees, their immediate family members, or entities controlled by them.

10. Biblical and Internal-Consistency Question

This memorandum states that Eleven22 organization's own teaching creates a fair internal-accountability question. Eleven22 teaches that believers constitute the Church, that believers are the God's Temple, and that all believers share the Royal Priesthood, while also maintaining a formal institutional Covenant Membership category. The theological position advanced here is that formal Covenant Membership should not be used as a spiritual barrier to accountability from believers when the institution itself teaches that the Church is the people rather than the institution.

Because Eleven22 is NOT a CHURCH but IN FACT a BUSINESS lawfully the distinction may still matter. Corporate 'member' status under Florida nonprofit law is a statutory/governance question, not a theological determination.

11. Proposed Closing to Eleven22

The purpose of these requests is to reconcile Eleven22's stated commitments to stewardship, biblical accountability, and member trust with the governance and financial structures that now accompany a large, sophisticated nonprofit organization (BUSINESS). Where the records disprove allegations, those allegations should be withdrawn. Where the records leave material questions unanswered, transparency is the most direct way to resolve them.

Appendix A - Core Documentary Sources used for this Memorandum

- Articles of Incorporation of The Church of Eleven22, Inc. (2011), corporate filing.
- Florida Annual Reports of The Church of Eleven22, Inc., 2012-2026.
- Covenant Membership Booklet 2024.pdf.
- Eleven22 2021 audited financial statements, previously reviewed public audit.
- Eleven22 stewardship/impact reports and Blueprint1122 public materials, previously reviewed public sources.
- ECFA membership-change record identifying Eleven22's February 11, 2026 departure as a voluntary resignation.
- Email requesting current bylaws dated August 30, 2026.