

#N18000000010

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## STATEMENT OF FACTS

Dear Mr. Caldwell,

I am writing to you on behalf of Hopewell Baptist Church of Alachua, Inc. We were an unincorporated trust, when this issue began in 2016. Our property located at 3901 NW 6<sup>th</sup> Street was deeded over to Deacon William Ryles and Deacon Leroy Robinson in 1985, as trustees of Hopewell Baptist Church of Alachua. In 1990 Deacon Robinson passed away and Deacon Lonnie Henley and Shirley Filer-Williams were appointed trustees by Deacon William Ryles. In 2005, Lonnie Henley and Shirley Filer-Williams took over all responsibilities of running the church. Deacon Ryles passed away in 2011.

Lonnie Henley and Shirley Filer-Williams hired Reverend Williams to serve as pastor from 2011-2015. Unfortunately, he passed away and the church was without a full-time pastor for over a year. In January 2016, Henley and Williams hired Rei J. Hines to serve as pastor. The business of the church was good for several months until Pastor Hines wanted to be added to the finance committee. He was told by Henley and Williams that a pastor should not serve on a finance committee because it would be a conflict of interest.

He accepted that, but a month or two later he requested that his wife be added to the finance committee. Again, Henley and Williams refused that request. December 9, 2017, Henley and Williams gave Mr. Hines his termination letter. Angry he was terminated, Mr. Hines approached the bank and attempted to gain access to the church's account. He was told that he could not access the account with the paperwork that he was presenting. He had a close friend who works at the bank and who was also a pastor, tell him that he could go and incorporate a church to gain control of the money.

At that time, the church is still an unincorporated trust. With that misinformation, Mr. Hines with ill and fraudulent intent formed Hopewell Missionary Baptist Church, Inc around December 28, 2017. He goes back to the bank and his friend fills the necessary forms out and gives him control of the account. The original signors, Lonnie Henley and Shirley Filer-Williams, of the account did not authorize or sign off on the transfer. You can see this in the enclosed documents. The account was eventually frozen, and the bank would not produce the paperwork concerning the transfer for the past two years. Knowing that a court battle was on the horizon, we hired an attorney who incorporated the mother church, Hopewell Baptist Church of Alachua, Inc, on May 14, 2018. This is the legal name of the church and lines up with the deed.

When the process was started, I talked to the Property Appraiser's office, and they told me to come back and they would transfer the exempt status the church has had for over 50 years to our new corporation when our filing was complete. And that's what they did. Court Case #01-2018-cc-1743 was decided in our favor on January 31, 2020 and the account was returned to Henley and Filer -Williams, the trustees of the Mother Church. Mr. Hines is claiming that he has a legal and valid interest in the Mother Church's property located at 3901 NW 6<sup>th</sup> Street, Gainesville, FL

I talked to our Property Appraiser's office here and they don't even have his corporation, Hopewell Missionary Baptist Church, Inc listed in their database. Mr. Hines created his corporation with deception and revenge after being terminated as pastor of Hopewell Baptist Church. Instead of leaving the church, he fraudulently created a new corporation and named it Hopewell Missionary Baptist Church, Inc.

You can see in his corporate filing, that he lists the Mother Church's address as his principal place of business, this is a false claim. Neither Rei J. Hines nor his corporation rents, leases or has permission from the trustees, Lonnie Henley or Shirley Filer-Williams to conduct business at The Mother Church. The Mother Church, Hopewell Baptist Church of Alachua, Inc is the only church legally recognized by the Appraiser's office as doing business from that location.

We humbly ask that Mr. Hines, the registering agent of Hopewell Missionary Baptist Church, Inc., be contacted and informed that their principal address of business must be changed on their filing or their corporation could be dissolved. I spoke to someone in your office that advised me to write you this letter and they stated that you could assist in clearing this matter up.

I thank you in advance for your time and consideration. If you have any questions or need any other supporting documents, please contact me at [REDACTED] or [REDACTED]

Respectfully submitted,

John L Gainey

Jurat Certificate  
State of Florida County of Alachua  
Subscribed and sworn to (or affirmed) before me on this  
10th day of February 2020  
by John L. Gainey  
whose identity I verified on the basis of  
Florida Drivers License  
Signature of Notary Nicole Faught

Nicole Faught  
NOTARY PUBLIC  
STATE OF FLORIDA  
Comm# GC098448  
Expires 4/26/2021