

DOCKET NO. 781-02-3281

IN THE MATTER OF: § BEFORE THE STATE OFFICE  
FIRST CENTURY CHRISTIAN § OF  
CHURCH, *Respondent* § ADMINISTRATIVE HEARINGS  
§

PASTOR CLIFFORD F. WILLIAM'S  
RESPONSE TO SUBPOENA BY PETIONER

TO THE HONORABLE JUDGE OF SAID COURT:

1. NOW COMES, **Pastor Clifford F. William**, and files this response to the items requested in Petitioner Subpoena, the Texas Higher Education Coordinating Board, (hereinafter referred to as THECB); and objects to the jurisdiction of the Court in the above entitled and numbered proceeding.
2. Pastor William objects to the jurisdiction of this Honorable Court due to the fact that First Century Christian Church (hereinafter referred to as **Church**) has not been served with Citation in this matter, there are no documented complainants nor complaints in this matter, and because this Honorable Court has no jurisdiction over Ecclesiastical matters. Moreover, Pastor William denies all accusations against the Church in the Ecclesiastical capacity of Pastor. William will represent (defend) himself and the Church.

**DEFINITION**

3. “**ecclesiastical**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “Pertaining to anything belonging to or set apart for the Church, as distinguished from “civil” or “secular,” with regard to the world.”
4. “**organization**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “As term is used in commercial law , includes a corporation, government or governmental

subdivision or agency, business trust, estate trust, trust, partnership or association, two or more persons having a joint or common interest, or any other legal or commercial entity. U.C.C. § 1-201(28) See also Charitable organizations”

**5.** “**Charitable organization**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “As regards “exempt” tax status, such includes: “Corporations, and any community chest, fund or foundation, organized and operated exclusively for religious, organized and operated exclusively for charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which inures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting, to influence legislation (except as otherwise provided in section (h), and which does not participate in or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.” I.R.C. § 501(c)(3). See also Benevolent associations; Benevolent corporation; Charitable corporation; Charitable foundation; Charitable institution.

**6.** “**Church**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “In its most general sense, the religious society founded and established by Jesus Christ, to receive, preserve, and propagate His doctrines and ordinances. ...”

**7.** “**ordinance**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “A rule established by authority; a permanent rule of action; a law or statute. ... The name has also been given to certain enactments, more general in their character than ordinary statutes, and serving as organic laws, yet not exactly to be called “constitutions.”...”

**8.** “**person**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “... Scope and delineation of term is necessary for determining those whom Fourteenth Amendment of Constitution affords protection since this Amendment expressly applies to “person.”...”

**9.** Texas Administrative Code, TITLE 1, PART 7, CHAPTER 155, RULE §155.5; unless the context clearly indicates otherwise, definitions for: “authorized representative”, “Contested case”, “law”, “party”, “person”, “Pleading”, “Referring Agency”, and “SOAH” are as follows:

**10.** “(5) Authorized representative--An attorney authorized to practice law in the State of Texas or, if authorized by applicable law, a person designated by a party to represent the party.”

**11.** “(8) Contested case--A proceeding, including, but not restricted to, ratemaking and licensing, in which the legal rights, duties, or privileges of a party are to be determined by an agency after an opportunity for adjudicative hearing.”

12. “(10) Law--The United States and Texas Constitutions, state and federal statutes, rules and regulations, and relevant case law.”

13. “(13) Party--A person or agency named, or admitted to participate, in a case before SOAH. “

14. “(14) Person--Any individual, representative, corporation, or other entity, including any public or non-profit corporation, or any agency or instrumentality of federal, state, or local government. “

15. “(15) Pleading--A written document submitted by a party, or a person seeking to participate in a case as a party, which requests procedural or substantive relief, makes claims, alleges facts, makes legal argument, or otherwise addresses matters involved in the case. “

16. “(18) Referring Agency--A state board, commission, department, agency, or other entity that refers a contested case or other dispute to SOAH for process.”

17. “(19) SOAH--The State Office of Administrative Hearings.”

18. “**Christian**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “Pertaining to Jesus Christ or the religion founded by him; professing Christianity. As a noun, it signifies one who accepts and professes to live by the doctrines and principles of the Christian religion; it does not include Mohammedans, **Jews**, pagans, or infidels. One who believes or professes or is assumed to believe in Jesus Christ, and the truth as taught by Him.”

19. “**Christianity**” as found in BLACK’S LAW DICTIONARY 6<sup>TH</sup> EDITION: “The religion founded and established by Jesus Christ.”

### **POINT FOR POINT RESPONSE**

20. Pastor William responds to the Subpoena requests of THECB and attaches to these pleadings, a true and correct copy of the following books, records, papers, or other material, necessary, and proper for the purpose of the proceedings. Moreover, William will attempt to clarify the meaning of each item.

**(1) Document(s), including, but not limited to. The articles of association, the constitution, the by-laws, or other documents describing:**

**(a) the current organization of the Church;**

**ANSWER:** Church is not organized via the 14<sup>th</sup> Amendment to the US Constitution. Church is not an organization. Church is a “Church.” No documents exist to demonstrate the Church is an organization. Proving that a Church is a Church and documents regulating it are ecclesiastical matters and therefore are not within the jurisdiction of Civil or Secular Courts. THECB has failed to prove that the Church is an “organization” and has even failed to prove that the Church is a proper “party” to this matter.

**(b) in what manner its governing body is structured;**

**ANSWER:** The Church’s governing body is an ecclesiastical matter and is comprised of Christians who live by the doctrines and principles of Jesus. It is a part of Christianity.

**(c) the relative authority between the governing body and other church authorities, such as the pastor, minister, deacons, or other spiritual, or lay leaders;**

**ANSWER:** The relative authority is an ecclesiastical matter and is voluminous. To understand the relative authority, one must understand the relative responsibilities of Christians and each leader as well. See attached HOLY BIBLE, King James Version. A small sample of some, but not all authorities cited are highlighted below:

**Luke, chapter 20**

"1": And it came to pass, that on one of those days, as he taught the people in the temple, and preached the gospel, the chief priests and the scribes came upon him with the elders,

"2": And spake unto him, saying, Tell us, by what authority doest thou these things? or who is he that gave thee this authority?

"3": And he answered and said unto them, I will also ask you one thing; and answer me:

"4": The baptism of John, was it from heaven, or of men?

"5": And they reasoned with themselves, saying, If we shall say, From heaven; he will say, Why then believed ye him not?

"6": But and if we say, Of men; all the people will stone us: for they be persuaded that John was a prophet.

"7": And they answered, that they could not tell whence it was.

"8": And Jesus said unto them, Neither tell I you by what authority I do these things.

"9": Then began he to speak to the people this parable; A certain man planted a vineyard, and let it forth to husbandmen, and went into a far country for a long time.

"10": And at the season he sent a servant to the husbandmen, that they should give him of the fruit of the vineyard: but the husbandmen beat him, and sent him away empty.

"11": And again he sent another servant: and they beat him also, and entreated him shamefully, and sent him away empty.

"12": And again he sent a third: and they wounded him also, and cast him out.

"13": Then said the lord of the vineyard, What shall I do? I will send my beloved son: it may be they will reverence him when they see him.

"14": But when the husbandmen saw him, they reasoned among themselves, saying, This is the heir: come, let us kill him, that the inheritance may be ours.

"15": So they cast him out of the vineyard, and killed him. What therefore shall the lord of the vineyard do unto them?

"16": He shall come and destroy these husbandmen, and shall give the vineyard to others. And when they heard it, they said, God forbid.

"17": And he beheld them, and said, What is this then that is written, The stone which the builders rejected, the same is become the head of the corner?

"18": Whosoever shall fall upon that stone shall be broken; but on whomsoever it shall fall, it will grind him to powder.

"19": And the chief priests and the scribes the same hour sought to lay hands on him; and they feared the people: for they perceived that he had spoken this parable against them.

"20": And they watched him, and sent forth spies, which should feign themselves just men, that they might take hold of his words, that so they might deliver him unto the power and authority of the governor.

"21": And they asked him, saying, Master, we know that thou sayest and teachest rightly, neither acceptest thou the person of any, but teachest the way of God truly:

"22": Is it lawful for us to give tribute unto Caesar, or no?

"23": But he perceived their craftiness, and said unto them, Why tempt ye me?

"24": Shew me a penny. Whose image and superscription hath it? They answered and said, Caesar's.

"25": And he said unto them, Render therefore unto Caesar the things which be Caesar's, and unto God the things which be God's.

### **Matthew, chapter 7**

"1": Judge not, that ye be not judged.

"2": For with what judgment ye judge, ye shall be judged: and with what measure ye mete, it shall be measured to you again.

"3": And why beholdest thou the mote that is in thy brother's eye, but considerest not the beam that is in thine own eye?

"4": Or how wilt thou say to thy brother, Let me pull out the mote out of thine eye; and, behold, a beam is in thine own eye?

"5": Thou hypocrite, first cast out the beam out of thine own eye; and then shalt thou see clearly to cast out the mote out of thy brother's eye.

"6": Give not that which is holy unto the dogs, neither cast ye your pearls before swine, lest they trample them under their feet, and turn again and rend you.

"28": And it came to pass, when Jesus had ended these sayings, the people were astonished at his doctrine:

"29": For He taught them as one having authority, and not as the scribes.

### **Matthew, chapter 15**

"8": This people draweth nigh unto me with their mouth, and honoureth me with their lips; but their heart is far from me.

"9": But in vain they do worship me, teaching for doctrines the commandments of men.

"10": And he called the multitude, and said unto them, Hear, and understand:

"11": Not that which goeth into the mouth defileth a man; but that which cometh out of the mouth, this defileth a man.

"12": Then came his disciples, and said unto him, Knowest thou that the Pharisees were offended, after they heard this saying?

"13": But he answered and said, Every plant, which my heavenly Father hath not planted, shall be rooted up.

"14": Let them alone: they be blind leaders of the blind. And if the blind lead the blind, both shall fall into the ditch.

## **Jeremiah, chapter 2**

[1] Moreover the word of the LORD came to me, saying,

[2] Go and cry in the ears of Jerusalem, saying, Thus saith the LORD; I remember thee, the kindness of thy youth, the love of thine espousals, when thou wentest after me in the wilderness, in a land that was not sown.

[3] Israel was holiness unto the LORD, and the firstfruits of his increase: all that devour him shall offend; evil shall come upon them, saith the LORD.

[4] Hear ye the word of the LORD, O house of Jacob, and all the families of the house of Israel:

[5] Thus saith the LORD, What iniquity have your fathers found in me, that they are gone far from me, and have walked after vanity, and are become vain?

[6] Neither said they, Where is the LORD that brought us up out of the land of Egypt, that led us through the wilderness, through a land of deserts and of pits, through a land of drought, and of the shadow of death, through a land that no man passed through, and where no man dwelt?

[7] And I brought you into a plentiful country, to eat the fruit thereof and the goodness thereof; but when ye entered, ye defiled my land, and made mine heritage an abomination.

[8] The priests said not, Where is the LORD? and they that handle the law knew me not: the pastors also transgressed against me, and the prophets prophesied by Baal, and walked after things that do not profit.

[9] Wherefore I will yet plead with you, saith the LORD, and with your children's children will I plead.

[10] For pass over the isles of Chittim, and see; and send unto Kedar, and consider diligently, and see if there be such a thing.

[11] Hath a nation changed their gods, which are yet no gods? but my people have changed their glory for that which doth not profit.

[12] Be astonished, O ye heavens, at this, and be horribly afraid, be ye very desolate, saith the LORD.

[13] For my people have committed two evils; they have forsaken me the fountain of living waters, and hewed them out cisterns, broken cisterns, that can hold no water.

### **Jeremiah, chapter 3**

[1] They say, If a man put away his wife, and she go from him, and become another man's, shall he return unto her again? shall not that land be greatly polluted? but thou hast played the harlot with many lovers; yet return again to me, saith the LORD.

[2] Lift up thine eyes unto the high places, and see where thou hast not been lien with. In the ways hast thou sat for them, as the Arabian in the wilderness; and thou hast polluted the land with thy whoredoms and with thy wickedness.

[3] Therefore the showers have been withholden, and there hath been no latter rain; and thou hadst a whore's forehead, thou refusedst to be ashamed.

[4] Wilt thou not from this time cry unto me, My father, thou art the guide of my youth?

[5] Will he reserve his anger for ever? will he keep it to the end? Behold, thou hast spoken and done evil things as thou couldest.

[6] The LORD said also unto me in the days of Josiah the king, Hast thou seen that which backsliding Israel hath done? she is gone up upon every high mountain and under every green tree, and there hath played the harlot.

[7] And I said after she had done all these things, Turn thou unto me. But she returned not. And her treacherous sister Judah saw it.

[8] And I saw, when for all the causes whereby backsliding Israel committed adultery I had put her away, and given her a bill of divorce; yet her treacherous sister Judah feared not, but went and played the harlot also.

[9] And it came to pass through the lightness of her whoredom, that she defiled the land, and committed adultery with stones and with stocks.

[10] And yet for all this her treacherous sister Judah hath not turned unto me with her whole heart, but feignedly, saith the LORD.

[11] And the LORD said unto me, The backsliding Israel hath justified herself more than treacherous Judah.

[12] Go and proclaim these words toward the north, and say, Return, thou backsliding Israel, saith the LORD; and I will not cause mine anger to fall upon you: for I am merciful, saith the LORD, and I will not keep anger for ever.

[13] Only acknowledge thine iniquity, that thou hast transgressed against the LORD thy God, and hast scattered thy ways to the strangers under every green tree, and ye have not obeyed my voice, saith the LORD.

[14] Turn, O backsliding children, saith the LORD; for I am married unto you: and I will take you one of a city, and two of a family, and I will bring you to Zion:

[15] And I will give you pastors according to mine heart, which shall feed you with knowledge and understanding.

[16] And it shall come to pass, when ye be multiplied and increased in the land, in those days, saith the LORD, they shall say no more, The ark of the covenant of the LORD: neither shall it come to mind: neither shall they remember it; neither shall they visit it; neither shall that be done any more.

[17] At that time they shall call Jerusalem the throne of the LORD; and all the nations shall be gathered unto it, to the name of the LORD, to Jerusalem: neither shall they walk any more after the imagination of their evil heart.

[18] In those days the house of Judah shall walk with the house of Israel, and they shall come together out of the land of the north to the land that I have given for an inheritance unto your fathers.

### **Jeremiah, chapter 23**

[1] Woe be unto the pastors that destroy and scatter the sheep of my pasture! saith the LORD.

[2] Therefore thus saith the LORD God of Israel against the pastors that feed my people; Ye have scattered my flock, and driven them away, and have not

visited them: behold, I will visit upon you the evil of your doings, saith the LORD.

[3] And I will gather the remnant of my flock out of all countries whither I have driven them, and will bring them again to their folds; and they shall be fruitful and increase.

[4] And I will set up shepherds over them which shall feed them: and they shall fear no more, nor be dismayed, neither shall they be lacking, saith the LORD.

[5] Behold, the days come, saith the LORD, that I will raise unto David a righteous Branch, and a King shall reign and prosper, and shall execute judgment and justice in the earth.

[6] In his days Judah shall be saved, and Israel shall dwell safely: and this is his name whereby he shall be called, THE LORD OUR RIGHTEOUSNESS.

[7] Therefore, behold, the days come, saith the LORD, that they shall no more say, The LORD liveth, which brought up the children of Israel out of the land of Egypt;

[8] But, The LORD liveth, which brought up and which led the seed of the house of Israel out of the north country, and from all countries whither I had driven them; and they shall dwell in their own land.

#### **Ephesians, chapter 4**

[1] I therefore, the prisoner of the Lord, beseech you that ye walk worthy of the vocation wherewith ye are called,

[2] With all lowliness and meekness, with longsuffering, forbearing one another in love;

[3] Endeavouring to keep the unity of the Spirit in the bond of peace.

[4] There is one body, and one Spirit, even as ye are called in one hope of your calling;

[5] One Lord, one faith, one baptism,

[6] One God and Father of all, who is above all, and through all, and in you all.

[7] But unto every one of us is given grace according to the measure of the gift of Christ.

[8] Wherefore he saith, When he ascended up on high, he led captivity captive, and gave gifts unto men.

[9] (Now that he ascended, what is it but that he also descended first into the lower parts of the earth?)

[10] He that descended is the same also that ascended up far above all heavens, that he might fill all things.

[11] And he gave some, apostles; and some, prophets; and some, evangelists; and some, pastors and teachers;

[12] For the perfecting of the saints, for the work of the ministry, for the edifying of the body of Christ:

[13] Till we all come in the unity of the faith, and of the knowledge of the Son of God, unto a perfect man, unto the measure of the stature of the fullness of Christ:

[14] That we henceforth be no more children, tossed to and fro, and carried about with every wind of doctrine, by the sleight of men, and cunning craftiness, whereby they lie in wait to deceive;

[15] But speaking the truth in love, may grow up into him in all things, which is the head, even Christ:

[16] From whom the whole body fitly joined together and compacted by that which every joint supplieth, according to the effectual working in the measure of every part, maketh increase of the body unto the edifying of itself in love.

## **1 Corinthians, chapter 12**

[1] Now concerning spiritual gifts, brethren, I would not have you ignorant.

[2] Ye know that ye were Gentiles, carried away unto these dumb idols, even as ye were led.

[3] Wherefore I give you to understand, that no man speaking by the Spirit of God calleth Jesus accursed: and that no man can say that Jesus is the Lord, but by the Holy Ghost.

[4] Now there are diversities of gifts, but the same Spirit.

[5] And there are differences of administrations, but the same Lord.

[6] And there are diversities of operations, but it is the same God which worketh all in all.

[7] But the manifestation of the Spirit is given to every man to profit withal.

[8] For to one is given by the Spirit the word of wisdom; to another the word of knowledge by the same Spirit;

[9] To another faith by the same Spirit; to another the gifts of healing by the same Spirit;

[10] To another the working of miracles; to another prophecy; to another discerning of spirits; to another divers kinds of tongues; to another the interpretation of tongues:

[11] But all these worketh that one and the selfsame Spirit, dividing to every man severally as he will.

[12] For as the body is one, and hath many members, and all the members of that one body, being many, are one body: so also is Christ.

[13] For by one Spirit are we all baptized into one body, whether we be Jews or Gentiles, whether we be bond or free; and have been all made to drink into one Spirit.

[14] For the body is not one member, but many.

[15] If the foot shall say, Because I am not the hand, I am not of the body; is it therefore not of the body?

[16] And if the ear shall say, Because I am not the eye, I am not of the body; is it therefore not of the body?

[17] If the whole body were an eye, where were the hearing? If the whole were hearing, where were the smelling?

[18] But now hath God set the members every one of them in the body, as it hath pleased him.

[19] And if they were all one member, where were the body?

[20] But now are they many members, yet but one body.

[21] And the eye cannot say unto the hand, I have no need of thee: nor again the head to the feet, I have no need of you.

[22] Nay, much more those members of the body, which seem to be more feeble, are necessary:

[23] And those members of the body, which we think to be less honourable, upon these we bestow more abundant honour; and our uncomely parts have more abundant comeliness.

[24] For our comely parts have no need: but God hath tempered the body together, having given more abundant honour to that part which lacked:

[25] That there should be no schism in the body; but that the members should have the same care one for another.

[26] And whether one member suffer, all the members suffer with it; or one member be honoured, all the members rejoice with it.

[27] Now ye are the body of Christ, and members in particular.

[28] And God hath set some in the church, first apostles, secondarily prophets, thirdly teachers, after that miracles, then gifts of healings, helps, governments, diversities of tongues.

[29] Are all apostles? are all prophets? are all teachers? are all workers of miracles?

[30] Have all the gifts of healing? do all speak with tongues? do all interpret?

[31] But covet earnestly the best gifts: and yet shew I unto you a more excellent way.

### **1 Timothy, chapter 1**

[1] Paul, an apostle of Jesus Christ by the commandment of God our Saviour, and Lord Jesus Christ, which is our hope;

[2] Unto Timothy, my own son in the faith: Grace, mercy, and peace, from God our Father and Jesus Christ our Lord.

[3] As I besought thee to abide still at Ephesus, when I went into Macedonia, that thou mightest charge some that they teach no other doctrine,

[4] Neither give heed to fables and endless genealogies, which minister questions, rather than godly edifying which is in faith: so do.

[5] Now the end of the commandment is charity out of a pure heart, and of a good conscience, and of faith unfeigned:

[6] From which some having swerved have turned aside unto vain jangling;

[7] Desiring to be teachers of the law; understanding neither what they say, nor whereof they affirm.

[8] But we know that the law is good, if a man use it lawfully;

[9] Knowing this, that the law is not made for a righteous man, but for the lawless and disobedient, for the ungodly and for sinners, for unholy and profane, for murderers of fathers and murderers of mothers, for manslayers,

[10] For whoremongers, for them that defile themselves with mankind, for menstealers, for liars, for perjured persons, and if there be any other thing that is contrary to sound doctrine;

[11] According to the glorious gospel of the blessed God, which was committed to my trust.

[12] And I thank Christ Jesus our Lord, who hath enabled me, for that he counted me faithful, putting me into the ministry;

## **2 Peter, chapter 2**

1: But there were false prophets also among the people, even as there shall be false teachers among you, who privily shall bring in damnable heresies, even denying the Lord that bought them, and bring upon themselves swift destruction.

2: And many shall follow their pernicious ways; by reason of whom the way of truth shall be evil spoken of.

3: And through covetousness shall they with feigned words make merchandise of you: whose judgment now of a long time lingereth not, and their damnation slumbereth not.

4: For if God spared not the angels that sinned, but cast them down to hell, and delivered them into chains of darkness, to be reserved unto judgment;

5: And spared not the old world, but saved Noah the eighth person, a preacher of righteousness, bringing in the flood upon the world of the ungodly;

6: And turning the cities of Sodom and Gomorrha into ashes condemned them with an overthrow, making them an ensample unto those that after should live ungodly;

7: And delivered just Lot, vexed with the filthy conversation of the wicked:

8: (For that righteous man dwelling among them, in seeing and hearing, vexed his righteous soul from day to day with their unlawful deeds;

9: The Lord knoweth how to deliver the godly out of temptations, and to reserve the unjust unto the day of judgment to be punished:

10: But chiefly them that walk after the flesh in the lust of uncleanness, and despise government. Presumptuous are they, selfwilled, they are not afraid to speak evil of dignities.

### **Acts, chapter 13**

1: Now there were in the church that was at Antioch certain prophets and teachers; as Barnabas, and Simeon that was called Niger, and Lucius of Cyrene, and Manaen, which had been brought up with Herod the tetrarch, and Saul.

2: As they ministered to the Lord, and fasted, the Holy Ghost said, Separate me Barnabas and Saul for the work whereunto I have called them.

3: And when they had fasted and prayed, and laid their hands on them, they sent them away.

4: So they, being sent forth by the Holy Ghost, departed unto Seleucia; and from thence they sailed to Cyprus.

### **Proverbs, chapter 5**

1: My son, attend unto my wisdom, and bow thine ear to my understanding:

2: That thou mayest regard discretion, and that thy lips may keep knowledge.

3: For the lips of a strange woman drop as an honeycomb, and her mouth is smoother than oil:

4: But her end is bitter as wormwood, sharp as a two edged sword.

5: Her feet go down to death; her steps take hold on hell.

6: Lest thou shouldest ponder the path of life, her ways are moveable, that thou canst not know them.

7: Hear me now therefore, O ye children, and depart not from the words of my mouth.

8: Remove thy way far from her, and come not nigh the door of her house:

9: Lest thou give thine honour unto others, and thy years unto the cruel:

10: Lest strangers be filled with thy wealth; and thy labours be in the house of a stranger;

11: And thou mourn at the last, when thy flesh and thy body are consumed,

12: And say, How have I hated instruction, and my heart despised reproof;

13: And have not obeyed the voice of my teachers, nor inclined mine ear to them that instructed me!

14: I was almost in all evil in the midst of the congregation and assembly.

15: Drink waters out of thine own cistern, and running waters out of thine own well.

16: Let thy fountains be dispersed abroad, and rivers of waters in the streets.

17: Let them be only thine own, and not strangers' with thee.

18: Let thy fountain be blessed: and rejoice with the wife of thy youth.

19: Let her be as the loving hind and pleasant roe; let her breasts satisfy thee at all times; and be thou ravished always with her love.

20: And why wilt thou, my son, be ravished with a strange woman, and embrace the bosom of a stranger?

21: For the ways of man are before the eyes of the LORD, and he pondereth all his goings.

22: His own iniquities shall take the wicked himself, and he shall be holden with the cords of his sins.

23: He shall die without instruction; and in the greatness of his folly he shall go astray.

## **1 Corinthians, chapter 4**

1: Let a man so account of us, as of the ministers of Christ, and stewards of the mysteries of God.

2: Moreover it is required in stewards, that a man be found faithful.

3: But with me it is a very small thing that I should be judged of you, or of man's judgment: yea, I judge not mine own self.

4: For I know nothing by myself; yet am I not hereby justified: but he that judgeth me is the Lord.

5: Therefore judge nothing before the time, until the Lord come, who both will bring to light the hidden things of darkness, and will make manifest the counsels of the hearts: and then shall every man have praise of God.

6: And these things, brethren, I have in a figure transferred to myself and to Apollos for your sakes; that ye might learn in us not to think of men above that which is written, that no one of you be puffed up for one against another.

7: For who maketh thee to differ from another? and what hast thou that thou didst not receive? now if thou didst receive it, why dost thou glory, as if thou hadst not received it?

8: Now ye are full, now ye are rich, ye have reigned as kings without us: and I would to God ye did reign, that we also might reign with you.

9: For I think that God hath set forth us the apostles last, as it were appointed to death: for we are made a spectacle unto the world, and to angels, and to men.

10: We are fools for Christ's sake, but ye are wise in Christ; we are weak, but ye are strong; ye are honourable, but we are despised.

11: Even unto this present hour we both hunger, and thirst, and are naked, and are buffeted, and have no certain dwellingplace;

12: And labour, working with our own hands: being reviled, we bless; being persecuted, we suffer it:

13: Being defamed, we intreat: we are made as the filth of the world, and are the offscouring of all things unto this day.

14: I write not these things to shame you, but as my beloved sons I warn you.

15: For though ye have ten thousand instructors in Christ, yet have ye not many fathers: for in Christ Jesus I have begotten you through the gospel.

16: Wherefore I beseech you, be ye followers of me.

17: For this cause have I sent unto you Timotheus, who is my beloved son, and faithful in the Lord, who shall bring you into remembrance of my ways which be in Christ, as I teach every where in every church.

18: Now some are puffed up, as though I would not come to you.

19: But I will come to you shortly, if the Lord will, and will know, not the speech of them which are puffed up, but the power.

20: For the kingdom of God is not in word, but in power.

21: What will ye? shall I come unto you with a rod, or in love, and in the spirit of meekness?

### **Luke, chapter 22**

"19": And he took bread, and gave thanks, and brake it, and gave unto them, saying, This is my body which is given for you: this do in remembrance of me.

"20": Likewise also the cup after supper, saying, This cup is the new testament in my blood, which is shed for you.

"21": But, behold, the hand of him that betrayeth me is with me on the table.

"22": And truly the Son of man goeth, as it was determined: but woe unto that man by whom he is betrayed!

"23": And they began to inquire among themselves, which of them it was that should do this thing.

"24": And there was also a strife among them, which of them should be accounted the greatest.

"25": And he said unto them, The kings of the Gentiles exercise lordship over them; and they that exercise authority upon them are called benefactors.

"26": But ye shall not be so: but he that is greatest among you, let him be as the younger; and he that is chief, as he that doth serve.

"27": For whether is greater, he that sitteth at meat, or he that serveth? is not he that sitteth at meat? but I am among you as he that serveth.

### **Luke, chapter 9**

"1": Then he called his twelve disciples together, and gave them power and authority over all devils, and to cure diseases.

"2": And he sent them to preach the kingdom of God, and to heal the sick.

"3": And he said unto them, Take nothing for your journey, neither staves, nor scrip, neither bread, neither money; neither have two coats apiece.

"4": And whatsoever house ye enter into, there abide, and thence depart.

"5": And whosoever will not receive you, when ye go out of that city, shake off the very dust from your feet for a testimony against them.

"6": And they departed, and went through the towns, preaching the gospel, and healing every where.

### **Titus, chapter 1**

"1": Paul, a servant of God, and an apostle of Jesus Christ, according to the faith of God's elect, and the acknowledging of the truth which is after godliness;

"2": In hope of eternal life, which God, that cannot lie, promised before the world began;

"3": But hath in due times manifested his word through preaching, which is committed unto me according to the commandment of God our Saviour;

"4": To Titus, mine own son after the common faith: Grace, mercy, and peace, from God the Father and the Lord Jesus Christ our Saviour.

"5": For this cause left I thee in Crete, that thou shouldest set in order the things that are wanting, and ordain elders in every city, as I had appointed thee;

"6": If any be blameless, the husband of one wife, having faithful children not accused of riot or unruly.

"7": For a bishop must be blameless, as the steward of God; not selfwilled, not soon angry, not given to wine, no striker, not given to filthy lucre;

"8": But a lover of hospitality, a lover of good men, sober, just, holy, temperate;

"9": Holding fast the faithful word as he hath been taught, that he may be able by sound doctrine both to exhort and to convince the gainsayers.

"10": For there are many unruly and vain talkers and deceivers, specially they of the circumcision:

"11": Whose mouths must be stopped, who subvert whole houses, teaching things which they ought not, for filthy lucre's sake.

"12": One of themselves, even a prophet of their own, said, The Cretians are always liars, evil beasts, slow bellies.

"13": This witness is true. Wherefore rebuke them sharply, that they may be sound in the faith;

"14": Not giving heed to Jewish fables, and commandments of men, that turn from the truth.

"15": Unto the pure all things are pure: but unto them that are defiled and unbelieving is nothing pure; but even their mind and conscience is defiled.

"16": They profess that they know God; but in works they deny him, being abominable, and disobedient, and unto every good work reprobate.

## **Titus, chapter 2**

"1": But speak thou the things which become sound doctrine:

"2": That the aged men be sober, grave, temperate, sound in faith, in charity, in patience.

"3": The aged women likewise, that they be in behaviour as becometh holiness, not false accusers, not given to much wine, teachers of good things;

"4": That they may teach the young women to be sober, to love their husbands, to love their children,

"5": To be discreet, chaste, keepers at home, good, obedient to their own husbands, that the word of God be not blasphemed.

"6": Young men likewise exhort to be sober minded.

"7": In all things shewing thyself a pattern of good works: in doctrine shewing uncorruptness, gravity, sincerity,

"8": Sound speech, that cannot be condemned; that he that is of the contrary part may be ashamed, having no evil thing to say of you.

"9": Exhort servants to be obedient unto their own masters, and to please them well in all things; not answering again;

"10": Not purloining, but shewing all good fidelity; that they may adorn the doctrine of God our Saviour in all things.

"11": For the grace of God that bringeth salvation hath appeared to all men,

"12": Teaching us that, denying ungodliness and worldly lusts, we should live soberly, righteously, and godly, in this present world;

"13": Looking for that blessed hope, and the glorious appearing of the great God and our Saviour Jesus Christ;

"14": Who gave himself for us, that he might redeem us from all iniquity, and purify unto himself a peculiar people, zealous of good works.

"15": These things speak, and exhort, and rebuke with all authority. Let no man despise thee.

- (d) **what Church authority or governing body has the power to bind the Church or its assets by contract.**

**ANSWER:** Jesus Christ our LORD and SAVIOUR. The Church has no contracts yoking themselves to nonbelievers outside the Church. The Church has faith in God, not in contracts enforced by Civil Courts that have no jurisdiction over ecclesiastical matters. See attached HOLY BIBLE, King James Version. A sample of some, but not all authorities cited are highlighted below:

**2 Peter, chapter 2**

"1": But there were false prophets also among the people, even as there shall be false teachers among you, who privily shall bring in damnable heresies, even denying the Lord that bought them, and bring upon themselves swift destruction.

"2": And many shall follow their pernicious ways; by reason of whom the way of truth shall be evil spoken of.

"3": And through covetousness shall they with feigned words make merchandise of you: whose judgment now of a long time lingereth not, and their damnation slumbereth not.

## 2 Corinthians, chapter 6

"14": Be ye not unequally yoked together with unbelievers: for what fellowship hath righteousness with unrighteousness? and what communion hath light with darkness?

"15": And what concord hath Christ with Belial? or what part hath he that believeth with an infidel?

"16": And what agreement hath the temple of God with idols? for ye are the temple of the living God; as God hath said, I will dwell in, and walk in them; and I will be their God, and they shall be my people.

- (2) **The Church's account statements from its financial institution for the past 6 (six) months, showing the name on the account(s), and the address to which the the statements are sent.**

**ANSWER:** There are none. The Church is "Christian Only." See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

## 2 Corinthians, chapter 6

"14": Be ye not unequally yoked together with unbelievers: for what fellowship hath righteousness with unrighteousness? and what communion hath light with darkness?

- (3) **The signature cards on file with the church's financial institution, demonstrating who is authorized to draft on the account(s).**

**ANSWER:** (None exist) Not applicable, see Subpoena question #2

- (4) **The purchase , lease, or rent documents on any real estate to which the Church has a right of possession, showing who represented the church in the transaction.**

**ANSWER:** There are none. The Church has faith in God to provide all that is needed, moreover the HOLY BIBLE sets priorities. See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

## Matthew, chapter 23

"23": Woe unto you, scribes and Pharisees, hypocrites! for ye pay tithes of mint and anise and cummin, and have omitted the weightier matters of the law, judgment, mercy, and faith: these ought ye to have done, and not to leave the other undone.

**John, chapter 2**

"13": And the Jews' passover was at hand, and Jesus went up to Jerusalem,

"14": And found in the temple those that sold oxen and sheep and doves, and the changers of money sitting:

"15": And when he had made a scourge of small cords, he drove them all out of the temple, and the sheep, and the oxen; and poured out the changers' money, and overthrew the tables;

"16": And said unto them that sold doves, Take these things hence; make not my Father's house an house of merchandise.

- (5) **The current employment contracts between the Church and its pastor, and between the Church and any other employees with whom it has contracted.**

**ANSWER:** There are none. The Church is not a business. It is against Church doctrine to be a business. The Church has no "employees." The Church is "Christian Only." As such all relations within the Church are ecclesiastical matters. See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

**John, chapter 2**

"13": And the Jews' passover was at hand, and Jesus went up to Jerusalem,

"14": And found in the temple those that sold oxen and sheep and doves, and the changers of money sitting:

"15": And when he had made a scourge of small cords, he drove them all out of the temple, and the sheep, and the oxen; and poured out the changers' money, and overthrew the tables;

"16": And said unto them that sold doves, Take these things hence; make not my Father's house an house of merchandise.

- (6) **Any document, including, without limitation, memorandum(s) of understanding, resolution or order of the governing body, or contract, which commemorates the relationship between the Church and First Century Christian College of Law.**

**ANSWER:** There are none. The Church is not a business and all religious training is an ecclesiastical matter. Both the Church and First Century Christian College of Law are "Christian Only." See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

**John, chapter 2**

"13": And the Jews' passover was at hand, and Jesus went up to Jerusalem,

"14": And found in the temple those that sold oxen and sheep and doves, and the changers of money sitting:

"15": And when he had made a scourge of small cords, he drove them all out of the temple, and the sheep, and the oxen; and poured out the changers' money, and overthrew the tables;

"16": And said unto them that sold doves, Take these things hence; make not my Father's house an house of merchandise.

- (7) **If they are separate from the Church's, First Century Christian College of Law's financial institution's account statements for the past 6 (six) months, showing the name (s) on the account(s), and the address to which the statements are sent.**

**ANSWER:** There are none. First Century Christian College of Law is "Christian Only." See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

**2 Corinthians, chapter 6**

"14": Be ye not unequally yoked together with unbelievers: for what fellowship hath righteousness with unrighteousness? and what communion hath light with darkness?

- (8) **If they are separate from the Church's, the signature card(s) on file with First Century Christian College of Law's financial institution, demonstrating who is authorized to draft on the account(s).**

**ANSWER:** (None Exist) Not applicable, see Subpoena question #7

- (9) **Assumed name certificates for the First Century Christian Church, First Century Christian College of Law, First Century Christian Ministries, Wake-Up-America, or Wake Up America, or any other name associated with any of these names , or in which any of these entities do business.**

**ANSWER:** The terms First Century Christian Church, First Century Christian College of Law, Wake-Up-America, Wake Up America describe Churches and religious activities within churches and as such are ecclesiastical matters. None of these terms describe any "entities" nor does any term describe any "business." There are **no** "assumed name certificates" for these terms because any law requiring such a certificate would be in direct

violation of Article of the First, Bill of Rights 1791, to the U.S. Constitution which states “Congress shall make **no law** respecting an **establishment of religion...**” Congress wrote that Article and Amendment because they knew someday a group of people would write laws to control the Churches of America and that requiring Churches to have government documentation was just the beginning of government controls.

Pastor William does not know anything about First Century Christian Ministries as it pertains to this question. However, it is clear to William that THECB is on a fishing expedition to find someone close to William to harm, regardless of the facts in this matter.

Pastor William does not understand the scope of this question as it requests “any other name associated with any of these names.” God created everything and everybody; and God is “associated with any of these names.” This question demonstrates that THECB is on a fishing expedition to harm anyone near Pastor William in order to “**make the Good Lord happy.**”

- (10) **Copy of the minutes of the meetings of the governing body of the Church in which the person(s) who are authorized by Constitution or by-laws to make such decisions, appointed William to represent the church in this matter.**

**ANSWER:** There are no “minutes,” “persons,” “Constitution,” or “by-laws” applicable to this Question. Matters of faith are an ecclesiastical matter, like accreditation from God, no Civil or Secular authority has jurisdiction or the qualifications to comprehend authorization to represent the Church. THECB is certain that the actions of the Church “**must make the Good Lord sad**” and that is evidence enough to demonstrate that THECB does not have the eyes to see nor the ears to hear the words of Jesus Christ. THECB does not even know who The Church is, but has adjudicated The Church guilty anyway. This question seems to be in bad faith: asking who to serve proper notice to in this “appeal” stage of this matter?

- (11) **Copy of the minutes of the meetings of the governing body of the Church in which the person(s) who are authorized by Constitution or by-laws to make such decisions, were authorized to bind the Church in a contract.**

**ANSWER:** There are no “minutes,” “persons,” “Constitution,” or “by-laws” applicable to this Question. Matters of faith are an ecclesiastical matter, like accreditation from God, no Civil or Secular authority has jurisdiction or the qualifications to comprehend authorization to represent the Church. Moreover, the Church is not a business and acts on faith, and not on Civil Contracts. See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

**John, chapter 2**

"13": And the Jews' passover was at hand, and Jesus went up to Jerusalem,

"14": And found in the temple those that sold oxen and sheep and doves, and the changers of money sitting:

"15": And when he had made a scourge of small cords, he drove them all out of the temple, and the sheep, and the oxen; and poured out the changers' money, and overthrew the tables;

"16": And said unto them that sold doves, Take these things hence; make not my Father's house an house of merchandise.

### **Good cause does not exist for the issuance of Plaintiffs subpoena**

No Good cause exists for the issuance of this subpoena in that: THECB has failed to even attempt to serve citation on anyone in this matter before this Honorable SOAH Court and is only now trying to find someone else to serve citation after William has repeatedly brought the issue to this Honorable Court's attention. THECB has made clear its intention of suing any attorney who would dare step forward and defend this Church. THECB has admitted that there is no documented complainant nor complaint in this matter. THECB has initiated this matter because it "makes the Good Lord sad," clearly demonstrating that it is seeking to persecute this Church because of its religious beliefs. THECB is continuing this matter without demonstrating that the Church is within its jurisdiction and without demonstrating that the Church qualifies as a "party" in this Honorable SOAH Court. THECB's general counsel, Jan Greenberg, has hid information from The Church and changes her agreements because she does not have the same religious beliefs of the Church. William is not a "licensed attorney" because the HOLY BIBLE warns against lawyers (plural) acting in their own interests. See attached HOLY BIBLE, King James Version. Some, but not all authorities cited are highlighted below:

## **Luke, chapter 11**

"43": Woe unto you, Pharisees! for ye love the uppermost seats in the synagogues, and greetings in the markets.

"44": Woe unto you, scribes and Pharisees, hypocrites! for ye are as graves which appear not, and the men that walk over them are not aware of them.

"45": Then answered one of the lawyers, and said unto him, Master, thus saying thou reproachest us also.

"46": And he said, Woe unto you also, ye lawyers! for ye lade men with burdens grievous to be borne, and ye yourselves touch not the burdens with one of your fingers.

"47": Woe unto you! for ye build the sepulchres of the prophets, and your fathers killed them.

"48": Truly ye bear witness that ye allow the deeds of your fathers: for they indeed killed them, and ye build their sepulchres.

"49": Therefore also said the wisdom of God, I will send them prophets and apostles, and some of them they shall slay and persecute:

"50": That the blood of all the prophets, which was shed from the foundation of the world, may be required of this generation;

"51": From the blood of Abel unto the blood of Zacharias, which perished between the altar and the temple: verily I say unto you, It shall be required of this generation.

"52": Woe unto you, lawyers! for ye have taken away the key of knowledge: ye entered not in yourselves, and them that were entering in ye hindered.

"53": And as he said these things unto them, the scribes and the Pharisees began to urge him vehemently, and to provoke him to speak of many things:

"54": Laying wait for him, and seeking to catch something out of his mouth, that they might accuse him.

William is also not a "licensed attorney" because the laws that made the State Bar of Texas mandatory were put into effect by lawyers in the legislature in direct violation of the separation of powers doctrine and numerous other protected Inalienable rights. William denies being a "person" as claimed by Ms. Jan Greenberg of THECB. THECB seeks only now to find out who they have adjudicated after completely failing to prove that The Church

is an institution, much less an institution under their control. Moreover, THECB admits that the matters pending in this case to date have proceeded without proper notice. THECB has ignored The Church's answers to discovery and has ignored THECB's own lack of evidence and is conducting a "**witch hunt**" to find "Christians who know William" to harm.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Clifford F. William". The signature is written in a dark ink and is positioned above the typed name.

Clifford F. William, J.D.

Pastor

First Century Christian Church

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Houston, Texas 77074

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**DOCKET NO. 781-02-3281**

<b>IN THE MATTER OF:</b>	§	<b>BEFORE THE STATE OFFICE</b>
	§	
<b>FIRST CENTURY CHRISTIAN</b>	§	<b>OF</b>
	§	
<b>CHURCH, Respondent</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
	§	
	§	
	§	

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing pleading or document has been served upon all attorneys of record and any parties who are not represented by an attorney on the 9th day of October, A.D. 2002.

Jan Greenberg  
Texas State Bar Number 08386700  
General Counsel  
Texas Higher Education Coordinating Board  
1200 East Anderson Lane  
Austin, Texas 78752  
Fax: 1-512-427-6127

Type of Service: Fax.



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