

IFP  
United States District Court  
Eastern District of Michigan  
Southern Division

7/10

Bradley Lashawn Fowler  
Plaintiff (s)

Case: 2:08-cv-12572  
Judge: Cook, Julian Abele  
MJ: Majzoub, Mona K  
Filed: 06-17-2008 At 02:11 PM  
CMP BRADLEY LASHAWN FOWLER V. THOMAS NELSON PUBLISHING (DSE)

v.

Defendant (s)

Thomas Nelson Publishing

COMPLAINT

Plaintiff Bradley Lashawn Fowler brings this civil suit against Thomas Nelson Publishing, a Nashville, TN, company for discrimination, violating my Constitutional rights, negligence, breach of duty, & Duty of Care. After being denied membership into the Detroit Grand Lodge of the Masonic Order <sup>on 7/27/07 ZCF</sup> due to my homosexuality, I found that this denial was based on religious ethics & morals. Yet due to Thomas Nelsons Publishing blatant fraud, which included the implementation of the term-homosexuals within its bible, and classifying it as the authentic word of God, only to discover that such term was added to the bible in 1976 - And also understanding that such interpretation or revising of scripture is against religious sacred laws - this case <sup>deems serious attention.</sup>

Dated: 6/17/08

Bradley L. Fowler  
(SIGNATURE)

51074 Nott Rd. Ct #21  
(ADDRESS)

Canby ME 48188

734. 483. 7677  
(TELEPHONE)

①  
complaint (cont'd)

Thomas Nelson Publishing is a Nashville, TN based publishing company. Established in 1798 and presently controlled by Sam Moore and Chief Executive Officer Mike Hyatt. According to facts, in 1976 Thomas Nelson released its newly revised bible, which included the term "homosexual". This blatant form of discrimination has caused me serious emotional & mental instability. See Bank of Montreal v. Sigart Bank, 193 F.3d 818, 827 (4th Cir. 1999); Hitachi Credit Amer. Corp. v. Sigart Bank, 164 F.3d 614, 629 (4th Cir. 1999) "C.C.C. concealment, whether by word or conduct, may be the equivalent of a false representation because it always involves deliberate non-disclosures designed to prevent another from learning the truth. Moreover, a party's willful nondisclosure of a material fact that he knows is unknown to the other party may be an intent to practice actual fraud." Whereas "false representation" is an essential element of an action for fraud. Hamon v. Fawn Frig's Corp., 224 F.3d 1041, 1048 (8th Cir. 2003)

Background: Thomas Nelson Publishing knowingly implemented the term "homosexual" within its 1976 New King James Bible, and revised that Bible again in 1996, then revised it again in 2001 + 2006 - by completely removing the terminology. Yet failed to inform the public that such misrepresentation was not an intent to cause harm. This tortious act was committed deliberately and willfully. Knowing such intentional negligence would cause injury without concern for the consequences. This form of malice

complaint (cont'd)

also falls under willful use of false statements to damage another person's character, which is also classified as libel because it is a written communication, which is deliberately false and deceptive. See: Doe v. Sw. Grain, 309 F. Supp. 2d 1119, 1124 (D.N.J. 2004); In re Santos, 304 B.R. 639, 644 (D.N.J. 2004), also under the Restatement (Second) of Torts § 552 (1) (Section 552) - One who in the course of his business, profession or employment, or in any other transaction in which he has a pecuniary interest, supplies false information for the guidance of others in the business transaction is subject to liability for pecuniary loss caused to them by their justifiable reliance upon the information, if he fails to exercise reasonable care or competence in obtaining or communicating the info. See: Glen Holly Ent., Inc. v. Tektronix, Inc. 2002 F. 3d 367, 379 (9th Cir. 2003) (California Law); Cook, Parkiss + Lieber, Inc. v. W. Cal. Collection Serv., Inc. 911 F. 2d. 242, 246 (9th Cir. 1990)

Discussion:

Defendant willfully caused me to endure acts of hate, discrimination, and loss of sleep, appetite, by structuring their New King James Bible to reflect God's distate of homosexuals. Defendant did not take into account that doing such would cause personal injuries of suicidal tendencies, which is a violation under the "Duty of Care" clause. Defendant was also negligent and careless under a "Breach of Duty" simply by creating or allowing a dangerous situation above and

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complaint (cont'd)

beyond the normal level of risk one would encounter if they were not a practicing homosexual. This is also a violation of Product Liability (strict liabilities), which as a believer in the sacred laws of religious structure, such false implementation of the term "homosexual" created a life of self-alienation, self-destructive behavior (drug use). Such 'Manipulation' of biblical text falls under the strict liability claim - and considered unreasonably dangerous, by causing injury by the sale and use of this product. By designing this product to promote hate and violence towards homosexuals, because such product is promoted as being the "authentic word of God" it is a design defect.

See: Prosser v. American Press Co; 297 U.S. 233, 56 S. Ct. 444, 80 L. Ed. 660 (1936), Jacobson v. Massachusetts Supreme Court of the United States, 1905 197 U.S. 11, 25 S. Ct. 358, 49 L. Ed. 643, also Bradfield v. Roberts 175 U.S. 291, 20 S. Ct. 621, 44 L. Ed. 168 (1899), Mugler v. Kansas, 123 U.S. 623 8 S. Ct. 273 3, L. Ed. 205 (1887), Kovacs v. Cooper, 336 U.S. 77, 69 S. Ct. 448, 93 L. Ed. 513 (1949), Schenck v. United States 249 U.S. 47, 39 S. Ct. 247, 63 L. Ed. 470.

And according to scripture found unchanged from bible to bible since 1964 - 2 Peter 1:20 "Knowing this first, that no prophecy of the scripture is of any private interpretation. And Revelation 22:18+19 "For I testify unto every man

(4)

complaint (cont'd)

that hearken the words of the prophecy of this book, if any man shall add unto these things, God shall add unto him the plagues that are written in this book: and if any man shall take away from the words of the book of this prophecy, God shall take away his part out of the book of life, and out of the holy city, and from the things which are written in this book. These two scriptures have not changed, which verifies such revisions to be wrong and against religious structures.

See: Clardy Mfg., 88 F. 3d. at 359-60 (quoting Transp. Ins. Co. v. Faircloth, 858 S. W. 2d. 209 (Tex. 1993)). An expression of an opinion as to the happening of a future ~~event~~ may constitute fraud where the speaker purports to have special knowledge of facts that will occur or exist in the future.

Prayer:

I am seeking injunctive relief, rescission, compensation in the amount of ten million dollars, general damages, exemplary or punitive damages and the cost of suit. Such fraud implemented by this publishing company has placed grave standards on my ability to live my life happily, without stress or fear of being attacked due to my sexual preferences. This form of discrimination needs to be dealt with in a legal binding court of authority.

# CIVIL COVER SHEET

County in which action arose Wayne

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS** Bradley Lashawn Fowler **DEFENDANT'S** Thomas Nelson Publishing

**(b) County of Residence of First Listed Plaintiff** Wayne **County of Residence of First Listed Defendant** Williamson  
(EXCEPT IN U.S. PLAINTIFF CASES) CASES ONLY)

Case: 2:08-cv-12572

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MJ: Majzoub, Mona K

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**CMP BRADLEY LASHAWN FOWLER V. THOMA  
S NELSON PUBLISHING (DSE)**

**(c) Attorney's (Firm Name, Address, and Telephone No)**

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only) (Place an "X" in One Box for Plaintiff and One Box for Defendant)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	<input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	
<input type="checkbox"/> 2 U.S. Government Defendant	<input checked="" type="checkbox"/> 5 Citizen of This State	<input type="checkbox"/> 6 Citizen of Another State	<input type="checkbox"/> 7 Citizen or Subject of a Foreign Country
	PTF DEF	PTF DEF	PTF DEF
	<input checked="" type="checkbox"/> 1 <input type="checkbox"/> 1	<input type="checkbox"/> 2 <input checked="" type="checkbox"/> 2	<input type="checkbox"/> 3 <input type="checkbox"/> 3
		<input type="checkbox"/> 4 <input type="checkbox"/> 4	<input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5
			<input type="checkbox"/> 6 <input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input checked="" type="checkbox"/> 365 Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395II) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Resportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<b>LABOR</b>	<b>IMMIGRATION</b>
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions

**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding  2 Removed from State Court  3 Remanded from Appellate Court  4 Reinstated or Reopened  5 Transferred from another district (specify)  6 Multidistrict Litigation  7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION** Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
U.S. Code Title 42 Chapter 21

Brief description of cause: I am suing for discrimination, negligence, breach of DUTY, DUTY of CARE

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS-ACTION UNDER F.R.C.P. 23  DEMAND \$ \$ 10 million dollars  CHECK YES only if demanded in complaint: **JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions): **JUDGE** \_\_\_\_\_ **DOCKET NUMBER** \_\_\_\_\_

**DATE** \_\_\_\_\_ **SIGNATURE OF ATTORNEY OF RECORD** \_\_\_\_\_

**FOR OFFICE USE ONLY** Bradley Lashawn Fowler Pro Se

**RECEIPT #** \_\_\_\_\_ **AMOUNT** \_\_\_\_\_ **APPLYING IFP** \_\_\_\_\_ **JUDGE** \_\_\_\_\_ **MAG. JUDGE** \_\_\_\_\_

# PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

Yes  
 No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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