

United States District Court  
Eastern District of Michigan  
Southern Division

9

Bradley Lashawn Fowler

Plaintiff (s)

Case: 2:08-cv-12889  
Judge: Taylor, Anna Diggs  
MJ: Hluchaniuk, Michael J.  
Filed: 07-07-2008 At 03:41 PM  
CMP FOWLER V. ZONDERVAN PUBLISHING  
HOUSE (JTC)

V.

Defendant (s)

Zondervan Publishing House  
Corp. LLC

COMPLAINT

Plaintiff Bradley Lashawn Fowler brings this civil complaint against Zondervan Publishing House, a Grand Rapids, MI. based company, on the grounds of Malicious Negligence, Breach of Duty, Duty of Care, Intentional Torts, Malice, Strict Liability, and violating my civil right according to the U.S. Constitution, 14th Amendment.

After purchasing a New King James Bible, published by Zondervan Publishing, in an effort to gain better clarity concerning my religious beliefs and homosexual preference, I was dismayed to find that the Bible purchased had excluded the terminology -homosexual- from its text. Yet when I began researching other Bibles published by the same publishing company (Zondervan), I discovered Zondervan had revised its text and implemented the terminology -homosexual- in its 1982 & 1987 editions, but the term had been expurgated from their 1989 & 1994 editions, and written completely opposite of one another.

In the 1989 edition it reads: I Corinthians 6:9 " Do you not know that the wrong does will not inherit the Kingdom of God? Do not be deceived! Fornicators, idolaters, adulterers, male prostitutes, sodomites... "

The 1982 edition reads: I Corinthians 6:9 " Do you not know that the wicked will not inherit the Kingdom of God? Do not be deceived: Neither the sexually immoral nor idolaters nor adulterers nor male prostitutes nor homosexual offenders... "

Dated: 7/7/08

Bradley Lashawn Fowler  
(SIGNATURE)

51074 Mott Rd. St. 21  
(ADDRESS)

Canton, MI 48108

734-483-7677  
(TELEPHONE)

## complaint (cont'd)

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In their 1987 edition it reads: I Corinthians 6:9 "Do you not know that the unrighteous and wrongdoers will not inherit or have any share in the Kingdom of God? Do not be deceived (misled): neither the impure and immoral, nor idolaters, nor adulterers, nor those who participate in homosexual ..."

Yet in the 1994 edition it reads: "Know ye not that the unrighteous shall not inherit the Kingdom of God? Be not deceived: neither fornicators, nor idolaters, nor adulterers, nor effeminate, nor abusers of themselves with mankind."

This misrepresentation is a willful and deliberate tort. Fraudulently imposing a written defamation or libel, in order to prevent me from marrying someone of the same sex in this state. This obvious coerced method of mind control and social dictatorship violates the religious sacred laws which prevent anyone from adding to the Biblical scriptures or from taking any words away from the text.

Facts:

Zondervan Publishing House was established in 1931 and is presently mastered by HarperCollins and Bruce Ryskamp who is the Chief Executive. According to Zondervan Publishing House mission statement, they are a company that strives to ensure continued success in serving its customers. They also profess to protect and serve their customers by holding themselves accountable to these mission and shared values.

Yet in filing copyright dates for each Bible edition printed, and understanding that any work filed with a copyright date of 1978 and beyond has a protection bill for 50 or more years or at least until Dec. 31, 2027.

Considering that in 1989 Zondervan filed a copyright on their New Revised Standard Version Holy Bible, yet neglected to inform its consumers and readers that such revisions would be revised to reflect an opinionated perspective. In I Corinthians 6:9 which in this particular edition did not defame homosexuals. Then, they turned in another copyright form in 1982 for their New International Version Bible, which includes the written defamation towards homosexuals; it seems this obvious intentional tort was imposed with a willful intention to cause injury to persons, myself, who are homosexual.

## complaint (cont'd)

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Considering a willful and wanton act is an act understood as likely to cause injury and committed without concern for the consequences, particularly those which may endanger the lives or safety of others. This includes malice - considering the state of mind of those who willfully agreed to incorporate such terminology based on opinionated idea, ~~there~~ shows an act of deliberation to set out and cause injury to persons of a homosexual nature or male or male intimacy, without due cause and without regard to the legal rights of those who are heterosexual.

Any act deliberately intended to cause damage, loss, or pain and suffering of a person is malicious injury. This can also be classified as fraud or deceit by misrepresentation to deliberately impose false statements or material facts. This willful use of false statements to damage another person's character or reputation, or to adversely affect a person's means of earning a living falls under both libel and slander.

This willful neglect and unintentional tort also proves Zonderman has failed to act in accordance with the law, commonly known as an omission. This also falls under negligence, which is typically defined as a failure to act that results in injury to another person.

It is also a Breach of Duty, negligence in law or negligence per se, willful negligence, defined as reckless indifference towards a ~~person's~~ person's safety, demonstrated by the failure to exercise ordinary care to prevent injury in the face of imminent danger and gross negligence - defined as intentionally acting or failing to act with a deliberate disregard for the welfare of others, as well as, culpable negligence, defined as the willful and wanton creation of an unreasonable risk that will probably cause death or injury to another person.

In this case, I must provide evidence that loss, harm, or pain and suffering was caused by Zonderman Publishing's negligence, the doctrine of res ipsa loquitur, a latin term meaning "the thing speaks for itself" which is proof of my sustained harm, pain and suffering, and emotional distress, caused by an act that normally would not have occurred unless Zonderman willfully incorporated the terminology "homosexual" in its text...

complaint (cont'd)

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and by promoting such to be the authentic word of God. This malicious conspiracy has prevented me from sleeping at night, anxiety (which caused me to endure breathing treatments at a medical facility), loss of appetite, self-esteem, and the ability to reestablish my family bond, because my family says "homosexuality is a sin because the Bible says it is." Zondervan Publishing caused this foreseeable injury, since it is a nationally recognized and worldly distributed publisher of Bibles. This is not only a fraudulent act imposed against me, but on society as a whole.

This tortious act initiated an avalanche of emotional and mental embarrassment, demoralization, chaos, bewilderment, and perplexities. This has caused me physical discomfort and prevented me from maintaining a normal intake of the proper nutrients and vitamins needed to sustain good health, as a chronically ill patient.

See: Bank of Montreal v. Signet Bank, 193 F.3d 818, 827

(4th Cir. 1999); Hitachi Credit Corp. v. Signet Bank, 166 F.3d

614, 629 (4th Cir. 1999) ("(c) concealment, whether by word or conduct, may be the equivalent of a false representation because it always involves deliberate non-disclosure designed to prevent

another from learning the truth. Moreover, a party with 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' Corp. 324 F.3d 1041, 1048 (8th Cir. 2003)

Also see, ( Sailor Im, supra, 5 Cal. 3d) 18 and

Arp v. Worcos Corp. Appeals Bd., supra, 19 Cal. 3d 395, 404-406).

And Lawrence v. Texas 539 U.S. 558 (2003)

Also See Gibson v. Berryhill, 411 U.S. 564, 93 S. Ct. 1869, 36 L. Ed. 2d 488 (1973)

and United Jewish Organizations v. Carey - U.S. - 197 S. Ct. 996, - L. Ed. 2d - (1977)

USDC-AA 2/26/97

complaint (cont'd)

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Background: Zondervan Publishing House knowingly implemented the term-homosexual- to its 1982 and 1987 new edition Bibles. Yet elected to revise that text and remove the text from its 1994 edition. Ironically, the 1989 edition didn't include the term either. Still, Zondervan Publishing neglected to inform the general public of these changes.

In *Doe v. Sw. Grain*, 309 F. Supp. 2d 1119, 1124 (D.N.D. 2004)  
 In *Re Santos*, 304 B.R. 639, 664 (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 the justifiable reliance upon the information, if he fails to exercise reasonable care or competence in obtaining or communicating the information.

See: *Glenn Hall Ent., Inc. v. Tektronix Inc.* 352 F.3d. 369, 379 (9th Cir. 2003) (California Law); *Cook, DeKiss & Liche Inc. v. W. Cal. Collection Serv., Inc.* 911 F.2d. 242, 246 (9th Cir. 1990)

Also see *Runyon v. McCrary* 427 U.S. 160, 96 S. Ct. 2586, - L. Ed. 2d - (1976)

complaint (cont'd)

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Discussion:

Willfully and intentionally designing a religious sacred document to reflect an individual opinion or a groups conclusion, based up modern theology, derived by scholarly men and Bible publishers, editors, copy editors, and formatters, with an intent to cause me or anyone who is a homosexual to endure verbal abuse, discrimination, episodes of hate, and physical violence ... including murder, defile's sacred Biblical laws. The same structured laws that has held the very foundation of Americas religious ethics and morals.

Zonderman did not take into account the considerable amount of retaliation I would receive from my family, friends, co-workers, church members, or general society. Publicizing these fraudulent revised versions of misrepresented biblical interpretations ... or as being the authentic word of God. This in-itself is misleading and a willful act of coercion.

Countless of lives have been destroyed, misused, and misunderstood solely by the written defamations imposed upon homosexuals, through the structured words compiled and distributed for financial gain. This immoral and deceitful act has helped to cultivate a social society that discriminates against homosexuals solely based on the Bible. The same Book being revised every other year or so by Zonderman Publishing House.

complaint (cont'd)

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Selling merchandise which promotes fraudulent opinions upon the general public can also be classified as a strict liability. Whereas the deliberate intent to cause injury by the sale and use of the product, promoting it to be the Word of God can also be considered a defective designed product.

See: *Clary Mfg. 88 F. 3d. at 359-60 (Quoting Transp. Ins. Co. v. Fairclay, 898 S. W. 2d. 269 (Tex. 1995)* - 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. See *Crawley v. Christensen, 137 U.S. 86, 89*

My Prayer:

I seek injunctive relief, rescission, compensation in the monetary amount of sixty million dollars, general damages, exemplary or punitive damages and the cost of suit. This representation of fraud imposed by Zanderuz Publishing has placed grave conditions on my ability to live a happy and stress free life as a homosexual. Blatant discrimination requires legal resolutions.

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET** County in which action arose \_\_\_\_\_

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 C. Fowler*  
*51074 Mott Rd. St. 21*  
*Carbor, ME 48188*

**(b) County of Residence of First Listed Plaintiff** *Carbor, ME*  **Wagner** ✓  
 (EXCEPT IN U.S. PLAINTIFF CASES)

**(c) Attorney's (Firm Name, Address, and Telephone Number)**

**DEFENDANT'S** *Zonderman Corp. LLC*  
*5300 Patterson Ave. S.E.*  
*Grand Rapids, MI 49530*

**County of Residence of First Listed Defendant**  
 (IN U.S. PLAINTIFF CASES ONLY)

**NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.**

**Attorneys (If Known)**

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

1 U.S. Government Plaintiff

3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant

4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<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"/> 162 Personal Injury - Med. Malpractice <input 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 <b>LABOR</b> <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. Inv. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<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 BIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD 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 Reapportionment <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 7410 <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> <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	<b>CIVIL RIGHTS</b> <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	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 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			

**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):  
*42 U.S.C. § 1983 28 U.S.C. § 1331*

Brief description of cause:  
*Breach of Duty, Malicious Negligence, Libel, Strict Liability*

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

**DEMANDS** *\$60 million dollars*

**JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE *7/7/08*

SIGNATURE OF ATTORNEY OF RECORD  
*Bradley C. Fowler*

**FOR OFFICE USE ONLY**

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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