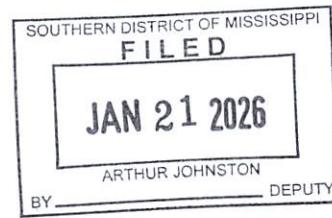


IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
 SOUTHERN DIVISION



REV. JOHN SHANE VAUGHN, individually and as the founding minister and representative of First Harvest Ministries International, a place of religious worship,

Plaintiff,

v.

1:26-cv-23-H90-BWR

ALLEN TROST; KATRINA TROST; ANDY SPROUSE; JOANNA SPROUSE; KIMBERLY MELTON; CHRIS MELTON; JENNIFER KINDER; LINDSEY CHANEY; CHARLES FLAKE a/k/a "DUKE LIZANA"; MRS. FLAKE (First Name Unknown); TONI F. SILCOX; LINDA ANDREAS; ERIC BLACKMUN; JANE DOE d/b/a "LILLY LOU"; JANE DOE d/b/a "GLENDA GOODWITCH"; "LILLY LOU WARRIORS," an unincorporated association; TIM GREER a/k/a "BONAFIDE"; OFFICER JOHN DOE; CITY OF WAVELAND, MISSISSIPPI; and DOES 1-20,

Defendants.

Civil Action No.: _____

JURY TRIAL DEMANDED

COMPLAINT FOR VIOLATIONS OF THE FREEDOM OF ACCESS TO CLINIC ENTRANCES ACT, THE KU KLUX KLAN ACT, 42 U.S.C. § 1983, AND STATE LAW

Plaintiff **REV. JOHN SHANE VAUGHN** brings this action individually and as the founding minister and representative of First Harvest Ministries International, a place of religious worship whose congregants' rights are directly implicated herein. Plaintiff proceeds pro se and respectfully submits this Complaint against Defendants, alleging as follows:

For purposes of this Complaint and the injunctive relief requested herein, "Defendants" includes all named Defendants, Doe Defendants, and all persons acting in concert, participation, coordination, or agreement with them, including agents, organizers, proxies, financiers, affiliates, and associates.

INTRODUCTION

1. This civil rights action arises from a three-year coordinated campaign of harassment, intimidation, threats, and interference with religious worship at First Harvest Ministries International ("FHMI"), a Hebrew Roots congregation in Waveland, Mississippi whose members observe biblical feast days including Sabbath, Passover, and Pentecost.
2. Defendants have deliberately targeted holy days—including Passover, Pentecost (Shavuot), and Super Sabbath—for their harassment campaigns. They have terrorized 84-year-old elderly worshippers, made death threats against children within earshot of minors, installed permanent intimidation displays including a sign reading "LILLY LOU IS WATCHING YOU" with surveillance cameras pointed at the sole entrance to the Ministry, and deposited defamatory materials in worshippers' mailboxes as part of their intimidation campaign.
3. Defendants have admitted on video that they are "a collective force" with "financing behind us" and that their harassment "is not gonna stop."
4. As of January 19, 2026, Defendants are actively planning another protest—confirmed by an inside source who texted: "the melton's are planning a protest of shane" and "it's 100% they are with lily lu."
5. Plaintiff seeks injunctive relief, compensatory damages, punitive damages, and attorney's fees under the Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248; the Ku Klux Klan Act of 1871, 42 U.S.C. §§ 1985(3) and 1986; 42 U.S.C. § 1983; and the laws of the State of Mississippi.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1334 (civil rights), and 18 U.S.C. § 248(c)(1)(A) (FACE Act private right of action).
7. This Court has supplemental jurisdiction over Plaintiff's state law claims under 28 U.S.C. § 1337.
8. Venue is proper in the Southern District of Mississippi under 28 U.S.C. § 1331(b) because a substantial part of the events giving rise to the claims occurred in Harrison County, Mississippi, and Defendants reside in or are subject to personal jurisdiction in this District.
9. This Court has personal jurisdiction over each Defendant because each has sufficient minimum contacts with Mississippi, including by traveling to Mississippi to participate in the harassment campaign, by committing intentional torts targeting Mississippi residents, and/or by residing in Mississippi.

PARTIES

Plaintiff

10. Plaintiff **REV. JOHN SHANE VAUGHN** is the Founding Apostolic Overseer of First Harvest Ministries International ("FHMI"). Rev. Vaughn has served in ministry for nearly 40 years, having been ordained at age 14. He is the author of over 50 books on theology and biblical studies. Rev. Vaughn resides in Harrison County, Mississippi, and brings this action individually and as the founding minister and representative of FHMI, a place of religious worship whose congregants' rights are directly implicated by Defendants' conduct.
11. **First Harvest Ministries International** is a Hebrew Roots ministry with its principal place of worship located in Waveland, Harrison County, Mississippi. FHMI's congregation observes biblical feast days including Passover, Pentecost (Shavuot), Feast of Tabernacles, and weekly Sabbath. The harms to FHMI and its congregants described herein are harms to the place of worship Rev. Vaughn leads and the worshippers whose rights he seeks to vindicate.

Defendants

A. Local Protestors

12. Defendant **ALLEN TROST** is an individual residing at 4604 Laurelwood Drive, D'Iberville, Mississippi 39540. Trost presents an elevated safety risk due to his former security role, insider knowledge of congregants' identities and routines, and documented aggressive conduct described herein. Trost formerly served as the Head of Security for FHMI, a position that gave him intimate knowledge of the Ministry's property layout, security protocols, and the identities, home addresses, vehicles, and routines of all ministry partners. In 2023, while serving as Head of Security, multiple congregants witnessed Trost physically pin a young male congregant against the wall of the church during a confrontation, using his body weight and physical force to restrain the individual. Multiple ministry partners will testify under oath that Trost routinely carried firearms while serving in his security role and during his continued harassment campaign. Trost has unlawfully deposited non-mail materials into United States Postal Service mailboxes belonging to ministry congregants, an act prohibited by federal postal regulations and undertaken as part of Defendants' intimidation campaign; appeared at a Planning & Zoning meeting without standing to oppose the Ministry's permit; stalked the Ministry's engineer and architect after that meeting; personally contacted prospective ministry partners with defamatory content, resulting in lost partnerships; has been captured on doorbell cameras at partners' homes; admitted on Facebook to distributing defamatory flyers; and has a documented history of volatile temper and aggressive conduct. **On April 6, 2024 — the eve of Passover — Trost participated in placing a "LILLY LOU IS WATCHING YOU" sign directly across from the church at night, then posted comments in the**

harassment group bragging about the intimidation: "Sissy boy ran to the back door too afraid of words. so much afraid calls the police... Had a great time." Trost also admitted that police officers told him to "keep it a peaceful protest" rather than enforcing federal law, and defamed Plaintiff as "This cult leader is weak" (Exhibits 36-38).

13. Defendant **KATRINA TROST** is an individual residing at 4604 Laurelwood Drive, D'Iberville, Mississippi 39540. Katrina Trost is an active participant in the harassment campaign and stayed at the Airbnb "command post" used to coordinate harassment activities during holy day protests.
14. Defendant **ANDY SPROUSE** is an individual residing in the vicinity of Waveland, Mississippi. Spouse is an active participant in the harassment campaign and has been present at multiple holy day harassment events.
15. Defendant **JOANNA SPROUSE** is an individual residing in the vicinity of Waveland, Mississippi. Joanna Spouse is an active participant in the harassment campaign.

B. Interstate Protestors

16. Defendant **KIMBERLY MELTON** is an individual residing at 1017 Sunrise Circle, Ashland City, Tennessee 37015, who has traveled interstate to participate in and coordinate the harassment campaign, evidencing the organized and multi-state nature of the conspiracy. Kimberly Melton made the following key admissions in a secretly recorded four-hour meeting (Exhibit 4): "We've got financing behind us" and "It's not gonna stop." As of January 19, 2026, Kimberly Melton is actively planning another protest against the Ministry, as confirmed by a text message from an inside source (Exhibit 24). **On August 17, 2024, during Super Sabbath services, Kimberly Melton used a bullhorn to scream at and taunt congregants, specifically targeting Janet Villareal—the grandmother of the child who had received death threats at the June 1, 2024 Pentecost harassment—while a second individual stood beside Melton videoing the congregants** (Exhibit 26). Kimberly Melton and Chris Melton have also traveled to Plaintiff's Parsonage at 282 Marcus Drive, filmed the residence, and posted the video to the Facebook group "Shane Vaughn/Professor Toto Disclose and Expose by former members" with the message: "This is for you Lilly Lou from The Meltons!" — demonstrating both stalking of Plaintiff's home and direct coordination with the "Lilly Lou" operation (Exhibits 31-33).
17. Defendant **CHRIS MELTON** is an individual residing at 1017 Sunrise Circle, Ashland City, Tennessee 37015, who has traveled interstate to participate in the harassment campaign. As of January 19, 2026, Chris Melton is actively planning another protest against the Ministry, as confirmed by the same text message (Exhibit 24).
18. Defendant **JENNIFER KINDER** is an individual residing at 246 Reston Lane, Ridgeview, West Virginia 25169, who has traveled interstate to participate in the harassment campaign. On August 17, 2024, Kinder trespassed on Ministry property during the Super Sabbath holy day while wearing a "LILLY LOU'S ARMY" t-shirt and conducted a Facebook Live harassment broadcast (Exhibit 1). Kinder also engaged in

fraudulent impersonation by falsely presenting herself as a United Pentecostal Church official in a telephone call to 84-year-old Wanda Kendrick (Exhibit 3).

19. Defendant **LINDSEY CHANEY** is an individual residing at 128 Grove Drive, Kingsport, Tennessee 37663, who has traveled interstate to participate in the harassment campaign. In the four-hour recorded meeting (Exhibit 4), Chaney admitted: "We're a collective force" and confirmed the use of multiple aliases, stating: "Not one person is Lilly Lou. Not one person is Belinda. All of these aliases are..." Chaney is believed to be the operator of the "Glenda Goodwitch" fake social media profile.
20. Defendant **TONI F. SILCOX** is an individual residing at 920 W. Michigan Avenue, Pensacola, Florida 32505, who has traveled interstate or participated remotely in the harassment campaign. Silcox posted a Facebook graphic on September 5, 2025, providing the Harrison County Zoning Department address and phone number, calling the Ministry an "unsavory religious movement" and a "cult," and directing people to "petition your County Board to continue with all of the cease-and-desist orders." Silcox is an active coordinator of the harassment campaign who facilitated governmental interference with Plaintiff's religious exercise.
21. Defendant **LINDA ANDREAS** is an individual residing at 21 Belmont Place, Maryville, Illinois 62062, who has participated in the interstate conspiracy to harass Plaintiff and interfere with religious worship. Upon information and belief, Andreas is involved in financing and/or coordinating the harassment campaign.
22. Defendant **ERIC BLACKMUN** is an individual residing at 5083 SE 1 1/2 Avenue, New Plymouth, Idaho 83655, who has participated in the interstate conspiracy to harass Plaintiff and interfere with religious worship. Upon information and belief, Blackmun is involved in financing and/or coordinating the harassment campaign.

C. Property Owners

23. Defendant **CHARLES FLAKE a/k/a "DUKE LIZANA"** is an individual residing in the Lizana community in the vicinity of Gulfport, Mississippi. Flake owns property adjacent to Remnant Ranch and has installed and maintains a permanent intimidation and surveillance apparatus at the sole point of ingress and egress to the place of religious worship, as more fully described in paragraphs 71-77 below. Flake is an active participant in the online harassment campaign, posting in the Facebook group "Shane Vaughn/Professor Toto Disclose and Expose by former members" under the alias "Duke Lizana." In a June 8 post, Flake threatened: "Lizana will never be friendly. The property will never be rezoned no matter how much money you milk from your mindless flock to that end" — demonstrating both his intent to interfere with the Ministry's land use and his coordination with the broader conspiracy (Exhibit 30).
24. Defendant **MRS. FLAKE** (First Name Unknown) is an individual residing in the vicinity of Waveland, Mississippi and is the co-owner of the property on which the permanent intimidation and surveillance apparatus is installed.

D. Anonymous/Pseudonymous Defendants

25. Defendant **JANE DOE d/b/a "LILLY LOU"** is the creator and/or operator of the "Lilly Lou" Facebook page, which has published daily defamatory content targeting Plaintiff for over three years. The true identity of this Defendant is unknown and will be ascertained through discovery. Upon information and belief, this Defendant may be Jennifer Kinder or may represent a collective operation.
26. Defendant **JANE DOE d/b/a "GLENDY GOODWITCH"** is the creator and/or operator of a fake social media profile used to coordinate harassment. Upon information and belief, this Defendant is Lindsey Chaney, as evidenced by the Instagram account @glenda_t_goodwitch.

E. Unincorporated Association

27. Defendant **"LILLY LOU WARRIORS"** is an unincorporated association of individuals who have organized for the purpose of harassing Plaintiff and the Ministry. The group has self-identified in video evidence (Exhibit 4), where Defendant Chaney stated "We're a collective force." Defendant Jennifer Kinder has been photographed wearing a "LILLY LOU'S ARMY" t-shirt. Gayle Faulkner is a confirmed member of this association and leaked protest plans to family members (Exhibit 24).

F. Suspected Financier

28. Defendant **TIM GREER a/k/a "BONAFIDE"** is an individual whose precise location is unknown. Upon information and belief, based on Defendant Kimberly Melton's admission that "We've got financing behind us" and other Defendants' references to an "original enemy" with deep pockets, Greer is the financier of the harassment conspiracy. In a Facebook comment in the harassment group, a participant asked: "Did anyone reach out to Tim Greer?" — confirming that Greer is a known figure within the conspiracy who is consulted or contacted for support (Exhibit 34). Plaintiff seeks expedited discovery to identify the full extent of financial support provided to the conspiracy.

G. Government Defendants

29. Defendant **OFFICER JOHN DOE** is a police officer employed by the Waveland Police Department who was present during the April 12, 2024 Passover harassment event. Despite witnessing FACE Act violations and having been specifically warned the day before by Rev. Vaughn about the planned harassment, Officer Doe sat in his vehicle at a distance and watched the harassment without intervening. When confronted, Officer Doe stated: "They have a right to protest—freedom of speech." Officer Doe is sued in his individual capacity.
30. Defendant **CITY OF WAVELAND, MISSISSIPPI** is a municipal corporation organized under the laws of Mississippi. The City is liable under *Monell v. Department of Social Services*, 436 U.S. 658 (1978), for failing to train its officers on the FACE Act and federal civil rights protections for religious worship, for

deliberate indifference to the known risk of harm to worshippers, and for ratifying Officer Doe's failure to act.

H. Doe Defendants

31. Defendants **DOES 1-20** are additional participants in the conspiracy whose identities are presently unknown and will be ascertained through discovery.

PROTECTED PROPERTIES

32. Plaintiff operates the following properties that are places of religious worship entitled to protection under federal law:
33. **FHMI Church — Waveland, Mississippi:** This is FHMI's primary place of worship. The property is located at a four-way stop intersection with no alternative ingress or egress. This geographic reality means that every worshipper must decelerate, stop, and idle at the intersection immediately adjacent to the Ministry property. Defendants have exploited this geography by positioning themselves to confront worshippers stopped in traffic, approaching vehicles, stepping into the path of vehicles, and directing bullhorns and signs at captive worshippers who cannot escape.
34. **Remnant Ranch — Gulfport, Mississippi:** This is a 30-acre prayer retreat center that serves as a secondary worship location. While titled in Rev. Vaughn's name, the property is dedicated to and used for religious worship purposes. The FACE Act protects the function of religious worship regardless of technical ownership. Remnant Ranch is regularly used for organized prayer gatherings, teaching, and religious assemblies, including scheduled worship activities, and is therefore a place of religious worship for purposes of this action.
35. **Parsonage — Harrison County, Mississippi:** This is the residence of Rev. Vaughn and First Lady Karen Vaughn. The Parsonage is used for pastoral counseling, prayer, and ministry meetings directly connected to Plaintiff's religious exercise. The Parsonage is used for scheduled ministry meetings, organized prayer, and pastoral religious gatherings as part of FHMI's worship life.

FACTUAL ALLEGATIONS

A. Formation of the Conspiracy

36. Beginning no later than 2021, Defendants formed a conspiracy to harass, intimidate, and interfere with religious worship at FHMI.

37. The "Lilly Lou" Facebook page was created as the public face of this conspiracy, publishing daily defamatory content targeting Plaintiff for over three years.
38. A private Facebook group titled "Shane Vaughn/Professor Toto Disclose and Expose by former members" was established to coordinate harassment activities.
39. Defendant Allen Trost, as the former Head of Security for FHMI, provided the conspiracy with intimate knowledge of the Ministry's operations, including the identities, home addresses, vehicles, and routines of all ministry partners.
40. In a secretly recorded four-hour meeting (Exhibit 4), Defendants made the following admissions establishing the existence and nature of the conspiracy:
 - a. Defendant Kimberly Melton stated: "We've got financing behind us."
 - b. Defendant Lindsey Chaney stated: "We're a collective force."
 - c. Defendant Lindsey Chaney stated: "Not one person is Lilly Lou. Not one person is Belinda. All of these aliases are..." confirming the use of multiple fake identities.
 - d. Defendant Kimberly Melton stated: "It's not gonna stop."

B. Targeting of Holy Days

41. Defendants have deliberately targeted holy days for their harassment campaigns, demonstrating hostility toward Plaintiff's religious identity and practices, including Sabbath observance and biblical feast days, and evidencing intent to target worshippers because of their religious exercise.
42. **Passover — April 6-12, 2024:** Defendants conducted a coordinated harassment campaign surrounding Passover services. On April 6, 2024 — the eve of Passover — Defendants placed a "LILLY LOU IS WATCHING YOU" sign directly across from the church at night during worship services. The intimidation was so severe that Rev. Vaughn was forced to enter his own church through the back door rather than the front entrance. Defendant Allen Trost subsequently bragged about this on social media, stating: "Sissy boy ran to the back door too afraid of words. so much afraid calls the police... Had a great time" (Exhibits 36-38). Rev. Vaughn had personally warned the Waveland Police Department the day before the main Passover service, and an officer was present on April 12 but failed to intervene. On April 6, Trost admitted that officers told him to "keep it a peaceful protest" rather than enforcing the FACE Act.
43. **Pentecost (Shavuot) — June 1, 2024:** Defendants conducted a coordinated harassment campaign during Pentecost services. 84-year-old Bishop Frank Kendrick and 84-year-old Wanda Kendrick were harassed while in their vehicle attempting to access the place of worship (Exhibit 2). During this same event, Defendants made threats against children, with Janet Villareal hearing protestors state that children "were gonna die" within earshot of minors (Exhibit 23).
44. **Super Sabbath — August 17, 2024:** Defendants conducted a coordinated multi-person harassment campaign during Super Sabbath services. As more fully described in Section E below, this single day saw

multiple defendants execute a coordinated attack including trespass, bullhorn harassment, and systematic distribution of defamatory flyers on worshippers' vehicles.

C. The April 2024 Passover Incident and Police Failure

45. On April 11, 2024, the day before the main Passover service, Rev. Vaughn personally met with the Waveland Police Department to warn them of the planned harassment and request protection for worshippers.
46. The police agreed to have an officer present to monitor the situation.
47. On April 12, 2024, Passover, Defendant Officer John Doe was present on scene but sat in his vehicle at a distance and watched as Defendants harassed worshippers attempting to enter the place of worship.
48. When Rev. Vaughn spoke with Officer Doe, the officer stated: "They have a right to protest—freedom of speech."
49. Officer Doe was wrong. The Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248, creates federal protections for worshippers at places of religious worship, and "protest" that crosses into physical obstruction or intimidation is not protected speech.
50. Officer Doe's inaction occurred after advance notice, on-scene observation, and explicit misstatement of federal law, and thereby constituted deliberate indifference to known violations of federally protected religious rights.
51. The pattern of police failure extended to the April 6, 2024 incident as well. **Defendant Allen Trost admitted on social media that when police responded to the intimidation that night, officers told him to "keep it a peaceful protest. I said yes sir."** This demonstrates that Waveland police officers were aware of the harassment, had direct contact with the perpetrators, and failed to enforce federal law — instead giving tacit approval to conduct that was causing the pastor to enter his own church through the back door out of fear.

D. The June 2024 Pentecost Incident

52. On June 1, 2024, during Pentecost (Shavuot) services, Defendants conducted a coordinated harassment campaign.
53. 84-year-old Bishop Frank Kendrick and 84-year-old Wanda Kendrick arrived for worship and were immediately targeted by Defendants.
54. The Kendricks became so fearful that they remained inside their vehicle, unable to exit to enter the place of worship.
55. Video evidence (Exhibit 2) shows the elderly couple in their vehicle, harassed by Defendants, afraid to exit to enter the place of worship.
56. During this same incident, Defendants made death threats against children. Janet Villareal, a grandmother present at the service, heard protestors state that children "were gonna die"—a threat made within earshot

57. Four children have provided trauma affidavits documenting lasting psychological harm from the threats and harassment (Exhibits 16-19).

E. The August 17, 2024 Super Sabbath Coordinated Attack

58. On August 17, 2024, during Super Sabbath services, Defendants executed a coordinated multi-person attack on Plaintiff's place of worship. The following incidents occurred during a single worship service, demonstrating that Defendants operate as an organized conspiracy rather than as individual protestors engaged in spontaneous expression:
59. **Jennifer Kinder Trespass:** Defendant Jennifer Kinder trespassed on Ministry property while wearing a "LILLY LOU'S ARMY" t-shirt, openly identifying herself as part of the organized harassment conspiracy. Kinder conducted a Facebook Live broadcast while trespassing, harassing worshippers in real time (Exhibit 1).
60. **Defamatory Flyer Distribution:** Defendants placed pre-printed defamatory flyers titled "First Harvest Cult" on worshippers' vehicles parked on church property during worship services. The flyers were distributed in two color versions (pink and blue), demonstrating pre-planning and coordination. Timestamped photographs show distribution occurred at 2:19 PM (blue flyers) and 2:45 PM (pink flyers). The flyers contained false and defamatory statements including:
 - a. Calling the Ministry a "cult" (defamation per se);
 - b. Claiming donations went "directly into Shane's personal financial accounts";
 - c. Claiming "no proof or documentation as to where the money has gone";
 - d. Claiming "Tithes also go into his personal financial accounts."(Exhibits 27-29)
61. **Kimberly Melton Bullhorn Harassment:** Defendant Kimberly Melton used a bullhorn to scream at and taunt congregants during the worship service. **Melton specifically targeted Janet Villareal—the grandmother of the child who had received death threats at the June 1, 2024 Pentecost harassment.** A second individual stood beside Melton videoing the congregants (Exhibit 26).
62. **Witness Intimidation:** The targeting of Janet Villareal is significant because Villareal had witnessed and reported the death threats against children at Pentecost (Exhibit 23). Melton's personalized bullhorn harassment of Villareal constitutes witness intimidation and demonstrates that Defendants target those who speak out against their harassment campaign.
63. The coordinated nature of the August 17, 2024 attack—with multiple defendants executing different roles (trespass, flyer distribution, bullhorn harassment, videography) simultaneously during a single worship

F. Meltons' Stalking of the Parsonage

64. Defendants Kimberly Melton and Chris Melton traveled to Plaintiff's Parsonage at 282 Marcus Drive, Waveland, Mississippi — Plaintiff's personal residence.
65. The Meltons filmed the Parsonage and posted the video to the Facebook group "Shane Vaughn/Professor Toto Disclose and Expose by former members."
66. The post was captioned: "This is for you Lilly Lou from The Meltons!" with a heart emoji, demonstrating:
 - a. Direct coordination between the Meltons and the "Lilly Lou" operation;
 - b. That the stalking of Plaintiff's home was undertaken as a contribution to the harassment campaign;
 - c. That the Meltons traveled interstate from Tennessee to Mississippi to surveil and film Plaintiff's residence.
67. This conduct constitutes stalking, invasion of privacy, and evidence of the interstate conspiracy.

G. Allen Trost's Pattern of Violence and Stalking

68. In 2023, while serving as Head of Security for FHMI, Defendant Allen Trost physically pinned a young male congregant against the wall of the church during a confrontation.
69. Multiple witnesses observed Trost use his body weight and physical force to restrain the individual, causing visible fear among those present (Exhibits 13-14).
70. Multiple ministry partners will testify under oath that Trost routinely carried firearms while serving in his security role and during his continued harassment campaign (Exhibit 15).
71. Since his departure from the Ministry, Trost has used his insider knowledge to stalk ministry partners, including appearing at their homes (captured on doorbell cameras), unlawfully depositing non-mail intimidation materials into their USPS mailboxes as part of his intimidation campaign, and personally contacting prospective ministry partners with defamatory content.
72. Trost appeared at a Planning & Zoning meeting without standing to oppose the Ministry's permit application, then stalked the Ministry's engineer and architect after the meeting.

H. Jennifer Kinder's Fraudulent Impersonation and Harassing Call

73. Defendant Jennifer Kinder engaged in fraudulent impersonation and deception by falsely presenting herself as a United Pentecostal Church official in a telephone call to 84-year-old Wanda Kendrick.
74. In the call (Exhibit 3), Kinder falsely identified herself as "Gwynevere Mullins" and claimed to be calling "on behalf of the UPC."

75. This fraudulent impersonation was designed to deceive and manipulate an elderly victim as part of the harassment conspiracy.

I. Permanent Intimidation and Surveillance at the Sole Point of Worship Access

76. Defendants Charles Flake and Mrs. Flake have installed and maintain a permanent intimidation and surveillance apparatus at the sole point of ingress and egress to Plaintiff's place of religious worship.
77. Specifically, Defendants erected a large sign at the only driveway entrance stating "**LILLY LOU IS WATCHING YOU**," accompanied by surveillance cameras intentionally aimed at the driveway, roadway approach, and worshippers entering and exiting the Ministry property.
78. This installation is not incidental expression. It is strategically placed at the only access point where all worshippers must slow, stop, and enter during religious services.
79. The sign and surveillance operate in coordination with Defendants' broader harassment campaign, which includes threats, stalking, publication of worshippers' identities, and targeted intimidation during holy days.
80. Worshippers reasonably fear that their identities, license plates, and movements are being monitored and recorded for retaliation, resulting in congregants remaining in vehicles, delaying entry, or refraining from attending services altogether.
81. The sign and surveillance therefore function as a menacing access-control mechanism, intentionally designed to intimidate and interfere with access to religious worship.
82. Additionally, Defendants Flake have installed a sign reading "WE BELIEVE KENT" that exploits the suicide of Rev. Vaughn's stepson Kent, who suffered from severe mental illness, and a toilet display intended to degrade worshippers (Exhibits 5-8).

J. Charles Flake's Zoning Interference and Online Harassment

83. Defendant Charles Flake, posting under the alias "Duke Lizana" in the Facebook harassment group, threatened to interfere with Plaintiff's land use rights.
84. On June 8, Flake posted: "Lizana will never be friendly. The property will never be rezoned no matter how much money you milk from your mindless flock to that end."
85. This statement demonstrates:
 - a. Flake's admission that his harassment is intentional and ongoing ("will never be friendly");
 - b. Flake's intent to interfere with the Ministry's zoning and land use applications;
 - c. Flake's defamation of the congregation ("mindless flock");
 - d. Flake's coordination with the online harassment conspiracy.

86. Flake was recruited to the harassment campaign by the "Lilly Lou" operation, which successfully enlisted him as a neighbor willing to install permanent intimidation apparatus at his property adjacent to Remnant Ranch.

K. Defamatory Publications

87. Defendants have published the following false statements of fact:

- a. "Millions of dollars were donated and went directly into Shane's personal financial accounts" — distributed via flyers by Allen Trost (Exhibit 9);
- b. "There has been no proof or documentation as to where the money has gone" — distributed via flyers by Allen Trost;
- c. "Tithes also go into his personal financial accounts" — distributed via flyers by Allen Trost;
- d. "First Harvest Cult" — distributed via flyers placed on worshippers' vehicles during worship services (Exhibits 27-29);
- e. "felons" — published on Facebook (Exhibit 10);
- f. "cult" — published repeatedly on social media.

88. These statements are false and were published with actual malice, with knowledge of their falsity or reckless disregard for the truth.

L. Invasion of Privacy

89. Defendants have invaded Plaintiff's privacy by publishing:

- a. Rev. Vaughn's personal bank records/receipts without consent (Exhibit 11);
- b. Photographs of Ministry children without consent (Exhibit 12);
- c. Photographs of Ministry partners to facilitate targeting and harassment.

M. Imminent Threat — January 2026

90. On January 19, 2026, Plaintiff received credible information that Defendants are actively planning another protest.
91. Gayle Faulkner, a member of the "Lilly Lou Warriors," told her son Chris Faulkner about the planned protest. Chris Faulkner texted his sister, Donna Faulkner, an Elder at FHMI.
92. The text message (Exhibit 24) stated: "the melton's are planning a protest of shane" and "it's 100% they are with lily lu."

93. This confirms that Defendants Kimberly and Chris Melton are actively planning imminent harassment and that the organized conspiracy remains active and poses an immediate threat to Plaintiff.

CLAIMS FOR RELIEF

COUNT I: Ku Klux Klan Act — Conspiracy to Interfere with Civil Rights

42 U.S.C. § 1985(3)

(Against All Private Defendants)

94. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
95. Defendants Allen Trost, Katrina Trost, Andy Spouse, Joanna Spouse, Kimberly Melton, Chris Melton, Jennifer Kinder, Lindsey Chaney, Charles Flake, Mrs. Flake, Toni F. Silcox, Linda Andreas, Eric Blackmun, Jane Doe d/b/a "Lilly Lou," Jane Doe d/b/a "Glenda Goodwitch," "Lilly Lou Warriors," Tim Greer, and Does 1-20 conspired with each other to deprive Plaintiff and FHMI's congregants of the equal protection of the laws and the equal privileges and immunities under the laws.
96. The object of the conspiracy was to prevent FHMI congregants from exercising their constitutional right to freely exercise their religion, including their right to attend religious worship services without harassment, intimidation, or obstruction.
97. Defendants' conspiracy was motivated by hostility toward Plaintiff's religious identity and practices, including Sabbath observance and biblical feast days, and evidencing intent to target worshippers because of their religious exercise. Defendants deliberately targeted holy days—Passover, Pentecost, Super Sabbath—for their harassment campaigns, demonstrating intentional targeting of Plaintiff and congregants based on their religious identity.
98. In furtherance of the conspiracy, Defendants committed overt acts including:
 - a. Conducting coordinated harassment campaigns during religious services;
 - b. Targeting elderly worshippers;
 - c. Making death threats against children;
 - d. Trespassing on Ministry property;
 - e. Installing permanent intimidation and surveillance apparatus;
 - f. Publishing defamatory content;
 - g. Stalking ministry partners;
 - h. Depositing non-mail intimidation materials in USPS mailboxes;

i. Engaging in fraudulent impersonation;

j. Placing defamatory "cult" flyers on worshippers' vehicles during services;

k. Using bullhorns to target and taunt specific congregants, including witnesses who reported prior harassment;

l. Videoing congregants for purposes of intimidation and identification.

99. As a direct and proximate result of Defendants' conspiracy, Plaintiff has suffered injuries to civil rights, emotional distress, lost donations and partnerships, and other damages.

100. Plaintiff is entitled to compensatory damages, punitive damages, and attorney's fees under 42 U.S.C. § 1988.

COUNT II: Ku Klux Klan Act — Neglect to Prevent Conspiracy

42 U.S.C. § 1986

(Against Officer John Doe and City of Waveland)

101. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

102. Defendant Officer John Doe had actual knowledge of the conspiracy alleged in Count I. On April 11, 2024, Rev. Vaughn personally warned the Waveland Police Department of the planned harassment. On April 12, 2024, Officer Doe was present on scene and witnessed the harassment.

103. Officer Doe had the power to prevent or aid in preventing the wrongs contemplated by the conspiracy. As a sworn law enforcement officer, Officer Doe had the authority to order Defendants to cease their harassment, to arrest Defendants for violations of law, and to protect worshippers attempting to access the place of worship.

104. Officer Doe neglected and refused to prevent the wrongs. Despite being present, having advance notice, and witnessing the harassment, Officer Doe sat in his vehicle at a distance and took no action.

105. Defendant City of Waveland is liable for its failure to train its officers on the FACE Act and federal civil rights protections for religious worship.

106. As a direct and proximate result of Defendants' neglect, Plaintiff has suffered injuries to civil rights, emotional distress, and other damages.

107. Plaintiff is entitled to compensatory damages and attorney's fees under 42 U.S.C. § 1988.

COUNT III: Freedom of Access to Clinic Entrances Act — Intimidation and Interference

18 U.S.C. § 248(a)(2)

(Against All Defendants Who Participated in or Aided the Intimidation or Interference With Worship Access)

108. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
109. The Freedom of Access to Clinic Entrances Act, 18 U.S.C. § 248(a)(2), prohibits anyone from "intentionally intimidat[ing] or interfer[ing] with any person lawfully exercising or seeking to exercise the First Amendment right of religious freedom at a place of religious worship."
110. FHMI's church in Waveland, Mississippi, Remnant Ranch in Gulfport, Mississippi, and the Parsonage are "place[s] of religious worship" within the meaning of the FACE Act.
111. Defendants Allen Trost, Katrina Trost, Andy Spouse, Joanna Spouse, Kimberly Melton, Chris Melton, Jennifer Kinder, Lindsey Chaney, Charles Flake, Mrs. Flake, Toni F. Silcox, Linda Andreas, Eric Blackmun, Jane Doe d/b/a "Lilly Lou," Jane Doe d/b/a "Glenda Goodwitch," "Lilly Lou Warriors," and Does 1-20 intentionally intimidated and interfered with Plaintiff and FHMI's congregants who were lawfully exercising their First Amendment right of religious freedom.
112. Defendants' conduct constitutes intentional intimidation and interference within the meaning of 18 U.S.C. § 248(a)(2), including:
 - a. Positioning intimidation signage and surveillance at the sole point of access to the place of worship;
 - b. Creating a credible fear of monitoring and retaliation against worshippers;
 - c. Confronting worshippers while stopped in traffic and unable to avoid engagement;
 - d. Making threats within earshot of minor children;
 - e. Causing elderly worshippers to fear exiting their vehicles;
 - f. Rendering access to religious services unreasonably difficult and hazardous;
 - g. Causing the pastor to enter his own church through the back door out of fear — as admitted by Defendant Trost: "Sissy boy ran to the back door too afraid of words";**
 - h. Placing defamatory flyers on worshippers' vehicles during worship services;
 - i. Using bullhorns to target and taunt specific congregants;
 - j. Targeting witnesses who reported prior harassment, thereby chilling participation in worship and cooperation with authorities.
113. The FACE Act authorizes private civil actions by persons aggrieved by violations. 18 U.S.C. § 248(c)(1) (A).
114. As a direct and proximate result of Defendants' violations, Plaintiff has suffered deprivation of constitutional rights, physical and emotional injury, loss of income and donations, and other damages.

115. Plaintiff is entitled to compensatory damages, punitive damages for the intentional nature of Defendants' violations, reasonable attorney's fees, and injunctive relief. 18 U.S.C. § 248(c)(1)(B).

COUNT IV: Freedom of Access to Clinic Entrances Act — Ongoing Campaign

18 U.S.C. § 248(a)(2)

(Against All Defendants Who Participated in or Aided the Intimidation or Interference With Worship Access)

116. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
117. Defendants' FACE Act violations constitute an ongoing campaign of intimidation and interference that has continued for over three years and is continuing as of the date of this Complaint.
118. On January 19, 2026, Plaintiff received confirmation that Defendants Kimberly and Chris Melton are actively planning another protest.
119. Defendant Kimberly Melton has stated: "It's not gonna stop."
120. The ongoing nature of Defendants' violations entitles Plaintiff to injunctive relief preventing future violations.
121. Plaintiff is entitled to injunctive relief, compensatory damages, and punitive damages for the willful and intentional nature of Defendants' ongoing campaign.

COUNT V: Deprivation of Rights Under Color of State Law

42 U.S.C. § 1983

(Against Officer John Doe and City of Waveland)

122. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
123. Defendant Officer John Doe, acting under color of state law as a sworn police officer for the City of Waveland, deprived Plaintiff and FHMI's congregants of their constitutional rights secured by the First and Fourteenth Amendments.
124. Officer Doe had a duty to protect worshippers attempting to exercise their constitutional right to religious worship. Officer Doe had advance notice of the planned harassment, agreed to provide protection, was present on scene, and witnessed the harassment.
125. Officer Doe's inaction occurred after advance notice, on-scene observation, and explicit misstatement of federal law, and thereby constituted deliberate indifference to known violations of federally protected religious rights.

126. Defendant City of Waveland is liable under *Monell v. Department of Social Services*, 436 U.S. 658 (1978), for:

- a. Failing to train its officers on the FACE Act and federal civil rights protections for religious worship;
- b. Deliberate indifference to the known risk that its officers would fail to protect worshippers;
- c. Ratifying Officer Doe's failure to act.

127. As a direct and proximate result of Defendants' deprivation of rights, Plaintiff has suffered injuries to civil rights, emotional distress, and other damages.

128. Plaintiff is entitled to compensatory damages, punitive damages against Officer Doe in his individual capacity, and attorney's fees under 42 U.S.C. § 1988.

COUNT VI: Civil Conspiracy

(Mississippi State Law)

(Against All Private Defendants)

129. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
130. Defendants agreed and combined to accomplish an unlawful purpose—the harassment, intimidation, and interference with Plaintiff's religious worship—by unlawful means.
131. Defendants committed overt acts in furtherance of the conspiracy, as detailed throughout this Complaint.
132. As a direct and proximate result of Defendants' conspiracy, Plaintiff has suffered damages.
133. All Defendants are jointly and severally liable for all damages arising from the conspiracy.

COUNT VII: Defamation

(Mississippi State Law)

(Against Trost, Kinder, Silcox, Jane Doe d/b/a "Lilly Lou," Jane Doe d/b/a "Glenda Goodwitch," and "Lilly Lou Warriors")

134. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
135. Defendants published false statements of fact concerning Plaintiff, including false accusations of financial crimes and misappropriation, and false statements calling the Ministry a "cult."
136. The statements were published with actual malice—with knowledge of their falsity or reckless disregard for the truth.

137. The statements constitute defamation per se as they accuse Plaintiff of crimes and call the Ministry a "cult."
138. Defendants distributed defamatory "First Harvest Cult" flyers on worshippers' vehicles during worship services on August 17, 2024, containing false accusations of financial misconduct (Exhibits 27-29).
139. As a direct and proximate result of Defendants' defamation, Plaintiff has suffered harm to reputation, lost donations and partnerships, emotional distress, and other damages.
140. Plaintiff is entitled to compensatory damages and punitive damages.

COUNT VIII: Intentional Infliction of Emotional Distress

(Mississippi State Law)

(Against All Private Defendants)

141. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
142. Defendants' conduct was extreme and outrageous, exceeding all bounds of decency tolerated in a civilized society.
143. Defendants' extreme and outrageous conduct includes:
 - a. Terrorizing 84-year-old elderly worshippers;
 - b. Making death threats against children;
 - c. Exploiting the suicide of Rev. Vaughn's stepson with the "WE BELIEVE KENT" sign;
 - d. Conducting a three-year daily defamation campaign;
 - e. Stalking ministry partners at their homes;
 - f. Installing permanent intimidation and surveillance apparatus including "LILLY LOU IS WATCHING YOU" at the sole point of worship access;
 - g. Publishing photographs of children and private financial records without consent;
 - h. Targeting Janet Villareal — the grandmother who reported death threats against children — for personalized bullhorn harassment, constituting witness intimidation;
 - i. Placing defamatory "cult" flyers on worshippers' vehicles during worship services.
144. Defendants acted intentionally or recklessly with respect to the severe emotional distress their conduct would cause.
145. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress.
146. Plaintiff is entitled to compensatory damages and punitive damages.

COUNT IX: Invasion of Privacy

(Mississippi State Law)

(Against Flakes and Kinder)

147. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
148. Defendants Charles Flake, Mrs. Flake, and Jennifer Kinder have invaded Plaintiff's privacy by:
 - a. Installing surveillance cameras at the sole point of worship access, pointed at the Ministry property and worshippers;
 - b. Publishing Rev. Vaughn's personal bank records without consent;
 - c. Publishing photographs of Ministry children without consent;
 - d. Publishing photographs of Ministry partners to facilitate targeting.
149. Plaintiff had a reasonable expectation of privacy in his financial records, images of Ministry children, and reasonable expectation that worshippers would not be surveilled at the point of worship access.
150. Defendants' invasion of privacy was highly offensive to a reasonable person.
151. As a direct and proximate result of Defendants' invasion of privacy, Plaintiff has suffered damages.

COUNT X: Trespass

(Mississippi State Law)

(Against Jennifer Kinder)

152. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
153. On August 17, 2024, Defendant Jennifer Kinder intentionally entered upon Ministry property without authorization.
154. Kinder's presence was without the consent of Plaintiff and against his will.
155. Kinder conducted a Facebook Live harassment broadcast while trespassing.
156. As a direct and proximate result of Kinder's trespass, Plaintiff has suffered damages.

COUNT XI: Stalking/Harassment**(Mississippi State Law)****(Against Trost, Kinder, Kimberly Melton, Chris Melton, Flake, and Jane Doe d/b/a "Lilly Lou")**

157. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
158. Defendants Allen Trost, Jennifer Kinder, Kimberly Melton, Chris Melton, Charles Flake, and Jane Doe d/b/a "Lilly Lou" have engaged in a pattern of conduct directed at Plaintiff and FHMI's congregants that would cause a reasonable person to feel fear or suffer substantial emotional distress.
159. Defendant Trost has stalked ministry partners at their homes, used his insider knowledge to target individuals, and engaged in repeated harassment over an extended period.
160. Defendant Kinder has engaged in repeated harassment including trespass, fraudulent impersonation, and targeted social media attacks.
161. **Defendants Kimberly Melton and Chris Melton have stalked Plaintiff by traveling interstate to his Parsonage, filming his residence, and posting the video to the harassment group with the message "This is for you Lilly Lou from The Meltons!"** Kimberly Melton has also engaged in witness intimidation by using a bullhorn to target Janet Villareal—a witness who reported death threats.
162. **Defendant Charles Flake has engaged in a pattern of harassment including installing permanent intimidation apparatus at the entrance to Remnant Ranch, posting threats in the online harassment group under the alias "Duke Lizana," and threatening to interfere with the Ministry's zoning applications.**
163. Defendant "Lilly Lou" has conducted a daily three-year campaign of targeted harassment.
164. As a direct and proximate result of Defendants' stalking and harassment, Plaintiff has suffered damages.

COUNT XII: Tortious Interference with Business Relations**(Mississippi State Law)****(Against Allen Trost)**

165. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
166. Plaintiff had existing business relationships with ministry partners who provided financial support to FHMI.
167. Defendant Allen Trost knew of these relationships through his prior role as Head of Security.
168. Trost intentionally and improperly interfered with these relationships by contacting ministry partners with defamatory content, unlawfully depositing non-mail intimidation materials into USPS mailboxes and distributing defamatory flyers to congregants and neighbors, and stalking partners at their homes.

169. As a direct and proximate result of Trost's interference, ministry partners terminated their relationships with FHMI, causing Plaintiff to lose donations and financial support.
170. Plaintiff is entitled to compensatory damages and punitive damages.

COUNT XIII: Tortious Interference with Prospective Business Relations

(Mississippi State Law)

(Against Allen Trost)

171. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
172. Plaintiff had a reasonable expectancy of entering into business relationships with prospective ministry partners.
173. Defendant Allen Trost knew of these prospective relationships through his prior role as Head of Security and ongoing surveillance.
174. Trost intentionally and improperly interfered with these prospective relationships by personally contacting prospective partners with defamatory content.
175. As a direct and proximate result of Trost's interference, prospective partners declined to enter into relationships with FHMI, causing Plaintiff to lose approximately 20 prospective partnerships.
176. Plaintiff is entitled to compensatory damages and punitive damages.

DAMAGES

177. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and continues to suffer the following categories of damages, in amounts to be proven at trial:

A. Compensatory Damages

- a. Lost Donations/Tithes — Three years of documented decline;
- b. Lost Partnerships — Partners who left; prospective partners contacted by Trost;
- c. Security Costs — Protection measures, security systems;
- d. Property Damage — Diminished value of Remnant Ranch; reputational harm;
- e. Lost Business Opportunities — Speaking engagements, books, media lost to defamation.

B. Emotional Distress Damages

- a. Rev. John Shane Vaughn — Three years daily defamation; suicide exploitation; threats; stalking;
- b. First Lady Karen Vaughn — Nursing career defamed; marriage questioned;
- c. Bishop Frank Kendrick (84) — Terrorized at Pentecost; harassed while in vehicle;
- d. Wanda Kendrick (84) — Terrorized at Pentecost; fraud phone call victim; elder abuse;
- e. Child Victims (4) — Terror; death threats; lasting psychological harm;
- f. Ministry Partners — Fear, intimidation, inability to worship freely;
- g. Janet Villareal — Witnessed death threats against children; subsequently targeted by Kimberly Melton with bullhorn harassment; witness intimidation.

C. Punitive Damages

178. Defendants' conduct warrants the imposition of punitive damages to punish their willful, malicious, and outrageous conduct and to deter similar conduct in the future. The factors supporting punitive damages include:

- a. Three-year deliberate campaign of harassment;
- b. Organized conspiracy with "financing behind us";
- c. Exploitation of Rev. Vaughn's stepson's suicide with the "WE BELIEVE KENT" sign;
- d. Death threats against children;
- e. Targeting 84-year-old elderly victims;
- f. Insider threat from former Head of Security;
- g. Refusal to cease: "It's not gonna stop";
- h. Video admissions demonstrating knowledge of wrongdoing;
- i. Witness intimidation — targeting Janet Villareal after she reported death threats;
- j. Coordinated multi-person attack on August 17, 2024 demonstrating pre-planning and organization.

D. Allen Trost Special Damages

179. Defendant Allen Trost is liable for special damages arising from his breach of the duty of loyalty owed to FHMI as its former Head of Security.

E. Joint and Several Liability

180. All Defendants are jointly and severally liable for all damages arising from the conspiracy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Injunctive Relief

For purposes of this Complaint, "religious services" means the period beginning two (2) hours before any scheduled worship service or holy day observance and ending two (2) hours after such service concludes, including arrival and departure of worshippers.

1. Issue a Temporary Restraining Order and Preliminary Injunction, to be made permanent after trial, enjoining Defendants from:
 - a. Coming within 500 feet of FHMI's place of worship in Waveland, Mississippi, along roadway approaches during religious services;
 - b. Coming within 300 feet of Remnant Ranch in Gulfport, Mississippi, during religious services;
 - c. Coming within 150 feet of the Parsonage at any time; loitering near, surveilling, or filming the Parsonage;
 - d. Approaching within one hundred (100) feet of any vehicle or worshipper;**
 - e. Using bullhorns, megaphones, or amplified sound within 500 feet of any protected property during religious services;
 - f. Contacting, intimidating, threatening, or harassing any identified FHMI worshipper, affiant, minor, or witness, including by phone, mail, email, text, or social media, for the purpose of interfering with worship or retaliating for participation in this case;
 - g. Appearing at the homes, workplaces, or businesses of ministry partners;
 - h. Publishing or disseminating any nonpublic home address or identifying information of any FHMI worshipper, affiant, or minor for purposes of intimidation, retaliation, or interference with worship;
 - i. Coordinating harassment of worshippers;
 - j. Placing flyers, pamphlets, or other materials on vehicles parked at the place of worship during religious services;**
2. Enjoining Defendants from maintaining intimidation signage or surveillance devices at the sole ingress or egress of Plaintiff's place of worship during religious services where such devices function to intimidate, monitor, or interfere with worshippers' access; this prohibition applies to surveillance conducted for the purpose of intimidation, identification, harassment, or retaliation, and does not restrict lawful, passive security systems not directed at worshippers;

3. Order Defendant Allen Trost specifically:

- a. To remain at least **500 feet** from Ministry properties during services and **200 feet** at all other times;
- b. To have no contact whatsoever with any ministry partner or minor;
- c. To cease all surveillance of Ministry property or partners;

4. Order Defendant Kimberly Melton specifically:

- a. To have no contact whatsoever with Janet Villareal or any member of her family;
- b. To refrain from using bullhorns, megaphones, or amplified sound directed at any identified FHMI congregant.

B. Damages

5. Award Plaintiff compensatory damages in an amount to be proven at trial;
6. Award Plaintiff punitive damages in an amount to be determined at trial;
7. Award Plaintiff special damages against Allen Trost in an amount to be proven at trial;

C. Fees and Costs

8. Award Plaintiff reasonable attorney's fees and costs under 42 U.S.C. § 1988 and 18 U.S.C. § 248(c)(1) (B);
9. Award Plaintiff pre-judgment and post-judgment interest;

D. Other Relief

10. Grant such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.



Respectfully submitted,

REV. JOHN SHANE VAUGHN, Pro Se Plaintiff

Founding Apostolic Overseer

First Harvest Ministries International

282 Marcus Drive

Waveland, MS 39576

Phone: (903) 355-8601

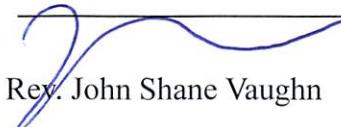
Email: brotherv Vaughn@gmail.com

Dated: January 21, 2026

VERIFICATION

I, Rev. John Shane Vaughn, declare under penalty of perjury that I am the Plaintiff in this action; that I have read the foregoing Complaint and know its contents; that the factual allegations are true and correct to the best of my knowledge, information, and belief; and that the allegations made on information and belief are believed to be true.

Executed on January 21, 2026, in Harrison County, Mississippi.



Rev. John Shane Vaughn

EXHIBIT LIST

Exhibit	Description
1	Video — Jennifer Kinder trespass (August 17, 2024)
2	Video — Pentecost harassment of Kendricks (June 1, 2024)
3	Video/Audio — Kinder fraud phone call to Wanda Kendrick
4	Video — 4-hour recording with admissions ("financing," "collective force," "not gonna stop")
5	Photo — "LILLY LOU IS WATCHING YOU" sign
6	Photo — "WE BELIEVE KENT" sign
7	Photo — Surveillance cameras
8	Photo — Toilet display
9	Screenshot — Defamatory flyer ("millions of dollars")
10	Screenshot — Silcox post ("felons," "cult")
11	Screenshot — Bank receipts posted without consent

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Exhibit Description

12 Screenshot — Photos of children posted without consent

13 Affidavit — Witness #1 to Trost pinning congregant (2023)

14 Affidavit — Witness #2 to Trost physical force (2023)

15 Affidavit — Witness to Trost carrying firearms

16 Affidavit — Child trauma #1

17 Affidavit — Child trauma #2

18 Affidavit — Child trauma #3

19 Affidavit — Child trauma #4

20 Affidavit — Bishop Frank Kendrick

21 Affidavit — Wanda Kendrick

22 Declaration — Rev. John Shane Vaughn

23 Affidavit — Janet Villareal (child death threats witness)

24 Screenshot — Text message (January 19, 2026) confirming Meltons planning protest

25 Affidavit — Donna Faulkner (received protest planning screenshot)

26 Video — Kimberly Melton bullhorn harassment of Janet Villareal (August 17, 2024)

27 Photo — "First Harvest Cult" pink flyer on red vehicle (August 17, 2024)

28 Photo — "First Harvest Cult" pink flyer on black Ford truck (August 17, 2024)

29 Photo — "First Harvest Cult" blue flyer being removed (August 17, 2024)

30 Screenshot — Charles Flake a/k/a "Duke Lizana" Facebook post threatening zoning interference (June 8)

31 Screenshot — Kimberly Melton post "This is for you Lilly Lou from The Meltons!" with Parsonage video

32 Screenshot — Facebook group showing Meltons' Parsonage video (showing URL and group name)

33 Screenshot — Additional Parsonage video screenshots showing property

34 Screenshot — Facebook comment "Did anyone reach out to Tim Greer?" confirming Greer's role

Exhibit Description

35 Screenshot — "WHERE'S THE TAPS MONEY" sign placed at property

36 Screenshot — "LILLY LOU IS WATCHING YOU" sign at church, night of April 6, 2024 (eve of Passover)

37 Screenshot — Lilly Lou post "Shane, we see your empty parking spot" with church photo

38 Screenshot — Allen Trost comments admitting intimidation and police contact: "Sissy boy ran to the back door too afraid"; "They said to me keep it a peaceful protest"; "This cult leader is weak"
