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BRIGHT STAR BAPTIST CHURCH OF AMERICA, INC.

NUMBER: 528542-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

PATRICK DENNIS, ET AL

CADDO PARISH, LOUISISANA

**PETITION FOR WRIT QUO WARRANTO,
PRELIMINARY AND PERMANENT INJUNCTION,
DELRATORY JUDGMENT AND DAMAGES**

NOW INTO COURT through undersigned counsel comes BRIGHT STAR

BAPTIST CHURCH OF AMERICA, INC., a Louisiana non-profit corporation, domicile in

Caddo Parish, Louisiana, with respect represents:

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1.

Made Defendants herein are:

- A. Patrick Dennis, a major resident and domiciliary of Caddo Parish, Louisiana, who may be served at his address of 5990 Manitoba Lane, Shreveport, LA 71107.
- B. LeVada Palms a major resident and domiciliary of Caddo Parish, Louisiana, who may be served at her address of 2516 Sheri Lane, Shreveport, LA 71109.

2.

BRIGHT STAR BAPTIST CHURCH OF AMERICAN, INC., hereinafter referred to as BRIGHTSTAR is a Baptist church located at 3330 Meriwether Road in Shreveport, Caddo Parish, Louisiana.

3.

BRIGHT STAR has Articles of Incorporation and By-laws which provide for the control of the entity the Board of Directors, and Board of Deacons.

4.

Patrick Dennis has been the pastor at BRIGHT STAR for the last several years and during that period of time Board of Deacons has received complaints about Patrick Dennis. More recently, the Board of Deacons received complaints of Patrick Dennis physically attacking a person at the church with a baseball bat and fathering a child with a church member.

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5.

Patrick Dennis took a leave of absence from his duties as a pastor in January, 2009, and during this time, the Board of Deacons received and compiled a litany of complaints regarding Patrick Dennis which was the basis for the vote of the Board of Deacons to remove the pastor and said complaints included, but are not limited to the following:

- a. The Board has received complaints of Rev. Dennis sexual relations with members of the church. In 1997, Rev. Dennis promised he would not fraternize with the women of the church.
- b. In his position as Pastor of the church, the Board of Deacons can not tolerate his actions with women of the church. His relationships with women of the church subjected the church to liability for his acts which could be the financial ruin of the church. Furthermore, his actions are against the teaching of God and have brought about discord in the church.
- c. On Sunday, January 18, 2009, a member of the church reported to the Board that Rev. Dennis was having sexual relations with his wife and had fathered a child evidenced by DNA results.
- d. The Board has received a complaint that Rev. Dennis had sexual relations with a mother and daughter that were members of the church. The daughter became pregnant and Rev. Dennis paid for the termination of the pregnancy. The mother and daughter are no longer members of the church.
- e. The Board has received a complaint that Rev. Dennis had sex with a woman who is a member of the church and she became pregnant. The Board was informed Court papers were filed in connection with this matter.
- f. Members of the Mount Zion Baptist Church had warned members of the Deacon Board that Rev. Dennis was a womanizer, but Rev. Dennis promised this would not occur again and he has not kept his word.
- g. There are letters of denigration on file with the church about Rev. Dennis from several women of Bright Star Baptist Church.
- h. The Board has received a complaint that Rev. Dennis has used Sons of the Church to transport him while he solicits sexual favors.
- i. The church spent over \$8,000.00 at a revival held in April, 2008. No money was funded back to the church which is contrary to the by-laws of the church.
- j. Rev. Dennis authorized Rev. Henry Lyons to preach at the church on June 27, 2008, and the funds raised were given to Rev. Lyons. The Board was unaware this was to occur. The Board did not approve of such action. The payment of all

funds raised without the authority of the Board is contrary to the by-laws of the church.

- k. Rev. Dennis removed \$3,000.00 in funds from the Destiny Camp funding. When confronted he initially denied he obtained the money. Upon investigation, it was concluded he took the money and he was made to repay the money.
- l. The Board gave Rev. Dennis a \$400.00 pay increase to allow him to purchase a nice vehicle, but the Board has received a complaint that he has used the money to pay women and other preachers.
- m. Rev. Dennis changed the name of the church on church material at a cost of \$1,151.00 in May, 2007, without the authorization of the Board of Deacons.
- n. Rev. Dennis purchased a church bus over the objection of the Board of Deacons. Now the church is burdened with the cost of maintenance and insurance on the bus.
- o. Rev. Dennis has been abusive on numerous occasions toward the Board of Deacons regarding financial issues. He charged or spent money without authorization requiring the church to bail him out to avoid embarrassment over the situation. The church refused to pay in some situation. Rev. Dennis has no authority over the finances of the church as per the by-laws.
- p. The Board has received complaints on more than one occasion wherein a disturbance in the pastor's study resulted in physical damage to the property of the church with a hole being knocked in a wall.
- q. The Board has received a complaint of Rev. Dennis having an altercation with a son of the church, N. Winn, while at services at the Lake Bethlehem Baptist Church.
- r. The Board has received a complaint that Rev. Dennis was in an altercation at LSU Hospital.
- s. Rev. Dennis did not preach for a total of 22 Sundays during the year 2008.
- t. Rev. Dennis announced a sabbatical leave to the congregation with no plan submitted to the Board.

7.

As a result of these actions, the Board of Deacons acting pursuant to the By-laws voted to remove Patrick Dennis as pastor of the church and prepared a petition of removal that was filed at the regular meeting of the church on February 1, 2009.

8.

Upon presentation of the petition to the church, LeVada Palms interrupted this orderly process required by the by-laws and called for an immediate vote to deny the

petition contrary to the By-laws. Palms took over the meeting and called for the immediate ouster of the Board of Deacons contrary to the by-laws and the laws of the State of Louisiana regarding meetings, notice, and actions.

9.

Without following any law of the State of Louisiana and the corporate by-laws procedures, Palms and others acting in concert and on behalf of Patrick Dennis have seized the corporate authority and began to take control of the church at the end of the regular Sunday service to include, but not limited to:

- a. Moving for the Petition to remove the pastor to be denied contrary to the by-laws;
- b. Moving for the ouster of the Board of Deacons in a meeting that was conducted without notice and contrary to the laws of the State of Louisiana;
- c. Calling for and holding a business meeting of the church on Sunday contrary to the By-laws;
- d. Calling a meeting of the membership without proper notice to the membership contrary to the laws of the State of Louisiana;
- e. Demanding control and/or taking possession of the property of Bright Star to include the keys, equipment, document/records, check books, etc.;
- f. Taking control of the church contrary to the authority of the Board of Directors of this corporation and without the approval of the Board of Directors;
- g. Ousting Directors of the Corporation contrary to the Laws of Louisiana;
- h. Taking control the finances of the Corporation without corporate authority.

10.

Additionally, on February 1, 2009, the offering collected at the church was taken and not given to the church as required by the By-laws of the church and further Patrick Dennis received the offering.

11.

Patrick Dennis and Palms acting in concert with others during the next week began to take over the church, as evidenced by a letter dated February 2, 2009, sent out to the various members of the Board of Deacons discharging the deacons as well as the official staff and trustee board from any and all capacity that the person held which

would include as a member of the board of directors of the church thereby violating Louisiana Law regarding the removal of a member of the board of directors.

12.

The Board of Directors of the corporation held a special meeting on February 7, 2009, wherein the By-laws were amended and Patrick Dennis was terminated as the pastor and Patrick Dennis was notified of his termination by the Board of Directors through his attorney Andrew Randall on February 8, 2009, by undersigned counsel. Randall was asked to notify Patrick Dennis.

13.

Because of the turmoil brought about by Dennis and Palms, the Board of Directors voted to cancel the church services for February 8, 2009, and to secure the premises by changing the locks on the church to secure the premises.

14.

A forceful entry was conducted on the church on the morning of February 8, 2009, contrary to the directive of the Board of Directors and based upon information and belief Patrick Dennis held services inside the church and had an offering collected. Petitioner further shows on information and belief that another meeting of the memberships was called without proper notice as required by law. Again, the money collected was not given to the church.

15.

On this date, another meeting of the members was held contrary to the by-laws and/or the notice requirements of the laws of State of Louisiana and the meeting was directed by LeVada Palms and/or others acting in concert with her.

16.

LeVada Palms claims to be the interim secretary – treasurer, but has not been hired and/or elected by the Board of Directors of Bright Star or any other lawfully constituted board of the church and has not been granted any authority by the Board of Directors or any valid lawfully constituted board of the church to act on behalf of the corporation nor has any meeting she has directed been called pursuant to any valid corporate body of the Petitioner, nor under the Laws of the State of Louisiana and all

actions and/or votes at the meetings of the membership should be declared null and void. Petitioner further shows that any acts by any new formed board or boards are unlawful and should be declared null and void.

17.

Petitioner seeks a writ of quo warranto issued herein and directed to LeVada Palms to show cause by what authority she has to hold office in Bright Star and what authority she holds to act on behalf of the corporation and after due proceedings that LeVada Palms be forbidden from claiming or exercising any right, power, privilege, or authority on behalf of Bright Star.

18.

Petitioner desires a judgment herein declaring that Patrick Dennis has been terminated pursuant to the action of the Board of Directors.

19.

Petitioner avers that it has and will suffer irreparable harm by the actions of LeVada Palms and Patrick Dennis to include, but not limited to the following:

- a. Deprive of the peaceable possession, use, and ownership of its property that is now under the possession and control of LeVada Palms and/or Patrick Dennis;
- b. The corporation is being denied and deprived its right to control its business through its Board of Directors and any other lawfully constituted board of the church pursuant to the By-laws and/or the laws of the State of Louisiana by the actions of LeVada Palms and Patrick Dennis in concert with others by holding and/or conducting unlawful meetings of the membership and acting on behalf of the corporation without the authorized capacity to do same;
- c. That Bright Star has been and is being denied the right to conduct meetings with membership in accordance with the by-laws or the laws of the State of Louisiana;
- d. Causing Bright Star's officials and staff to be unlawfully discharged during unlawful meetings;
- e. That the accumulation and/or potential accumulation of money from the corporation in the hands of these Patrick Dennis and LeVada Palms and/or persons acting in concert with them that belongs to the corporation is such an amount that these defendants can not respond in judgment thereby constituting irreparable harm to the plaintiff.

20.

Petitioner further shows that the actions of LeVada Palms and Patrick Dennis in conducting meetings without proper notice is reprobated, forbidden and prohibited by law entitling Petitioner to an injunction without the necessity of demonstrating irreparable harm.

21.

Petitioner seeks a preliminary injunction and permanent injunction and avers that it will suffer irreparable harm and unless LeVada Palms and any one acting in concert with her are restrained and/or enjoined as follows:

- a. From acting on behalf of Bright Star in any capacity including any matters dealing with the money and funds of Bright Star;
- b. Prohibited from unlawfully holding and/or calling membership meetings contrary to the by-laws and/or the laws of the State of Louisiana;
- c. Prohibited from taking possession of any property of Bright Star;
- d. Prohibited from discharging any official staff and/or director and/or Board member;
- e. Prohibited from participating in a membership meeting in any official capacity of Bright Star;
- f. Prohibited from interfering with the orderly conduct of any meeting held by Bright Star of its Board of Directors, Board of Deacons, Board of Trustees, and membership;
- g. Prohibited in collecting and/or retaining any sums of money collected at any service of Bright Star;

22.

Petitioner shows that Patrick Dennis has been discharged as pastor of Bright Star in accordance with the by laws of Bright Star and Petitioner seeks a preliminary injunction and permanent injunction and avers that it will suffer irreparable harm and unless Patrick Dennis and any one acting in concert with him are restrained and/or enjoined as follows:

- a. From acting on behalf of Bright Star in any capacity including any matters dealing with the money and funds of Bright Star;
- b. Prohibited from unlawfully holding and/or calling membership meetings contrary to the by-laws and/or the laws of the State of Louisiana;
- c. Prohibited from taking possession of any property of Bright Star;
- d. Prohibited from discharging any official staff and/or director and/or Board member;

- e. Prohibited from participating in a membership meeting in any official capacity of Bright Star;
- f. Prohibited from interfering with the orderly conduct of any meeting held by Bright Star of its Board of Directors, Board of Deacons, Board of Trustees, and membership;
- g. Prohibited from entering and remaining on the premises owned by Bright Star;

23.

Petitioner desires that a rule to show cause issue herein, directed unto the Defendants, ordering them to show cause, if any they can, on a date and hour to be determined by this Honorable Court, why there should not be judgment in favor of Plaintiff and against Defendants enjoining Defendants as set forth herein.

24.

Petitioner further shows that money was collected during services held on February 1 and 8, 2009, and that all sums of money are property of Bright Star.

25.

On information and belief, the sums collected were under the control of LeVada Palms and/or Patrick Dennis and Bright Star desires all those sums returned to Bright Star or in the alternative that damages be awarded in favor of Bright Star and against said Defendants for the amounts collected as damages. Petitioner further shows that any distribution of monies are unlawful and not pursuant to any lawful meeting and/or board formed as a result of an unlawful meeting and Petitioner is entitle to damages for any unlawful distribution resulting from the acts of the Defendants and/or anyone acting in concert with them.

26.

Petitioner shows on information and belief that LeVada Palms as the alleged treasurer of Bright Star and/or someone acting in concert with her had the control of bank accounts changed and/or attempted to change the bank accounts without corporate authority granted from the Board of Directors and/or any lawfully constituted board of the church.

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Petitioner is entitled to the return of all money removed from the bank accounts of the Plaintiff and for damages against the defendants for any sums of money removed from the corporate bank accounts of the Plaintiff without the authority of the Board of Directors and/or any lawfully constituted board of the church and without the lawful authority of the corporation.

WHEREFORE Petitioner, BRIGHT STAR BAPTIST CHURCH OF AMERICA, INC. prays that:

I. Citation issue and service be made upon the defendants, PATRICK DENNIS and LEVADA PALMS, be served with citation and service of process along with a certified copy of this petition, rule to show cause, and order of court assigning the date and hour of the trial thereon;

II. That a writ quo warranto issue to LeVada Palms directing her show cause of what authority she has to hold office in Bright Star and what authority she holds to act on behalf of the corporation and that after due proceedings had that LeVada Palms be forbidden from claiming or exercising any right, power, privilege, or authority to act on behalf of BRIGHT STAR BAPTIST CHURCH OF AMERICA, INC.;

III. That a rule to show cause issue herein, directed unto LeVada Palms , ordering her to show cause, if any she can, on a date and hour to be determined by this Honorable Court, why there should not be judgment in favor of Plaintiff and against Defendant issuing a preliminary injunction enjoining her and any one acting in concert with her as follows:

- a. From acting on behalf of Bright Star in any capacity including any matters dealing with the money and funds of Bright Star;
- b. Prohibited from unlawfully holding and/or calling membership meetings contrary to the by-laws and/or the laws of the State of Louisiana;
- c. Prohibited from taking possession of any property of Bright Star;
- d. Prohibited from discharging any official staff and/or director and/or Board member;
- e. Prohibited from participating in a membership meeting in any official capacity of Bright Star;

- f. Prohibited from interfering with the orderly conduct of any meeting held by Bright Star of its Board of Directors, Board of Deacons, Board of Trustees, and membership;
- g. Prohibited in collecting and/or retaining any sums of money collected at any service of Bright Star;

IV. That a rule to show cause issue herein, directed unto Patrick Dennis, ordering him to show cause, if any he can, on a date and hour to be determined by this Honorable Court, why there should not be judgment in favor of Plaintiff and against Defendant issuing a preliminary injunction enjoining him and any one acting in concert with him as follows:

- a. From acting on behalf of Bright Star in any capacity including any matters dealing with the money and funds of Bright Star;
- b. Prohibited from unlawfully holding and/or calling membership meetings contrary to the by-laws and/or the laws of the State of Louisiana;
- c. Prohibited from taking possession of any property of Bright Star;
- d. Prohibited from discharging any official staff and/or director and/or Board member;
- e. Prohibited from participating in a membership meeting in any official capacity of Bright Star;
- f. Prohibited from interfering with the orderly conduct of any meeting held by Bright Star of its Board of Directors, Board of Deacons, Board of Trustees, and membership;
- g. Prohibited from entering and remaining on the premises owned by Bright Star;

V. That after due proceedings and legal delays that there be judgment in favor of the Plaintiff and against the Defendants, Patrick Dennis and LeVada Palms granting a permanent injunction against said Defendants in the form of the preliminary injunction set forth above.

VI. That after due proceedings and legal delays that there be judgment in favor of the Plaintiff and against the Defendant, Patrick Dennis, declaring him terminated as pastor of the BRIGHT STAR BAPTIST CHURCH OF AMERICA, INC.

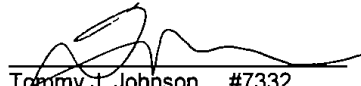
VII. That after due proceedings and legal delays that there be judgment in favor of the Plaintiff and against the Defendants declaring that any acts conducted on their

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behalf or allegedly on behalf of the membership and/or the corporation known as BRIGHT STAR BAPTIST CHURCH OF AMERICA, INC., pursuant to unlawful meetings be declared null and void.

VIII. That after due proceedings and legal delays had herein there be judgment in favor of Plaintiff against the Defendants, Patrick Dennis and LeVada Palms for return of the money removed from the bank accounts or gathered at church worship services of the Petitioner and alternately, for damages against these defendants for all sum removed and not returned to the Petitioner together with legal interest thereon until paid, and for all costs of these proceedings;

TYLER & JOHNSON



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