



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**FILED**

AUG 30 2011 NF  
A 49 30 2011  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Alex Walker,

CASE NO: 11 CV 4177

Plaintiff

v.

THREE ANGELS BROADCASTING  
NETWORK, INC., and TOMMY SHELTON

Defendants

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I, Tommy Shelton, defendant, in response to the complaint against me from plaintiff Alex Walker state as follows:

I deny all the allegations in the complaint except where expressly admitted herein with regard to each numbered paragraph in the complaint. I respond as follows;

Paragraph

1. I deny.
2. I admit that Alex Walker is a resident of the State of Illinois at this time. I deny that he was ever a resident of Virginia.
3. I admit the first part of paragraph 3 concerning Three Angels Broadcasting Network's present address and 3ABN being a non-profit corporation. I have no knowledge whether or not their Network Broadcast throughout the Northern District of Illinois and features programming filmed in the Chicago, Illinois area.
4. I deny that I was at all relevant times an employee/agent of 3ABN. I further deny that I sexually abused the Plaintiff in 1997 or any other time. I also deny working for 3ABN while living in Virginia. I admit moving to Kentucky and eventually commuting to work at 3ABN but deny abusing the Plaintiff. Additionally, I deny residing in Virginia at present but admit awaiting trial in Virginia.
5. I don't know.
6. I lack sufficient knowledge or information to know if paragraph 6 is true.
7. I lack sufficient knowledge or information to know if paragraph 7 is true.

8. I lack sufficient knowledge or information to know if paragraph 8 is true.
9. I admit that allegations of abuse were made and as a result the Church of God suspended my credentials. However, no charges were ever filed. I further admit that I eventually resigned Ezra Church of God.
10. I admit to being hired by 3ABN after leaving Ezra Church of God. I further deny that Danny Lee Shelton was aware of allegations of inappropriate behavior at the time I was hired by 3ABN.
11. I deny.
12. I deny that my involvement with Community Church of God in Dunn Loring, Virginia was a result of my affiliation with 3ABN. I further deny that I met Alex Walker in 1995 and that he was ever a member of the Community Church of God. I admit that I became pastor of the church in 1995. I deny that 3ABN was aware of any of my pastoral duties or what those duties entailed since one ministry had nothing to do with the other and there was no communication between the two.
13. I absolutely deny that I sexually abused Alex Walker in 1997 or any other time.
14. I deny that in 2000 I was the subject of more allegations of child sexual abuse. I admit I resigned the church and moved to Kentucky as a result of a serious heart attack. I further deny that I maintained a paid position at 3ABN while living in Virginia or for several months after moving to Kentucky.
15. I deny that in 2001 3ABN assigned me to the production department. I further deny that I participated in the filming of 3ABN's "Kids Time" programming. I admit to musically accompanying guests on a very limited basis while at the same time denying that Danny Shelton preached to kids while I was playing.
16. I deny.
17. I lack sufficient knowledge to know when Alex Walker worked in production at 3ABN, since I wasn't assigned to the production department until 2005. I deny that I ever knew he worked there until approximately 10 years after the fact. I absolutely deny sexually abusing him.
18. Once again, I deny all allegations of sexually abusing Alex Walker.
19. I admit to traveling from Kentucky, where I lived, to 3ABN in Illinois. I emphatically deny it was for the purpose of sexually abusing Alex Walker. I further deny the that there was ever mutual fondling, masturbation, and grinding our naked bodies together or any other form of sexual abuse.
20. I deny.
21. I deny.
22. I deny that Danny Lee Shelton covered up and ignored allegations of sexual abuse against me and

ordered 3ABN employees to do the same. I deny that Danny Lee Shelton lied about the state of my health and campaigned to discredit those that reported abuse. Further, I have no knowledge of Danny Lee Shelton threatening lawsuits against accusers.

23. I deny.

24. I deny.

25. I deny.

26. I deny.

27. I deny.

28. I repeat my answers to paragraphs 1-26.

29. I don't know.

30. I deny.

31. I deny.

32. I deny.

33. I repeat my answers to paragraphs 1-26.

34. I deny.

35. I deny.

36. I deny.

37. I deny.

38. I deny.

39. I repeat my answers to paragraphs 1-26.

40. I deny.

41. I deny.

42. I deny.

43. I deny.

44. I deny

45. I repeat my answers to paragraphs 1-26.

46. I deny.

47. I deny.

48. I deny.

49. I deny.

50. I don't know.

I ask that the lawsuit be dismissed and I request a jury trial.

Tommy Shelton

Date 8/26/2011

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