
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

Case No.: 07-40098-RWZ

**DEFENDANTS' MOTION FOR LEAVE TO FILE TWO SUPPLEMENTAL EXHIBITS:
(A) WARRANTS FOR THE ARREST OF TOMMY SHELTON, AND
(B) PRESS RELEASE ISSUED BY FAIRFAX COUNTY POLICE DEPARTMENT**

Defendants seek leave of the Court to supplement Defendants' reply (Doc. 233) filed on February 26, 2010. Defendants seek leave to supplement that reply with two additional exhibits: (a) Five warrants for the arrest of Tommy Shelton, obtained by the Fairfax County Police Department ("FCPD") on February 25, 2010, attached hereto as **Exhibit H**. (b) The March 18, 2010, FCPD press release concerning the March 16, 2010, arrest of Tommy Shelton on sexual assault charges arising from crimes that allegedly occurred in the 1990's, attached hereto as **Exhibit I**.

Defendants could not have filed these two exhibits with Defendants' February 26th reply because Defendants had no knowledge of the February 25 arrest warrants on February 26, and because the March 18 press release had not been released yet. Defendants were unaware of the arrest warrants until March 18, and did not obtain the arrest warrants until March 29.

These two exhibits refute Plaintiffs' assertion that Defendants' reporting of the child molestation allegations against Tommy Shelton (and Danny Lee Shelton's cover up thereof) was "uncorroborated, unfounded." (Doc. 231 p. 5).

WHEREFORE, Defendants pray the Court to allow the supplementing of Defendants' reply (Doc. 233) with the five arrest warrants as Exhibit H, and the press release as Exhibit I.

Respectfully submitted,

Dated: April 1, 2010

/s/ Gailon Arthur Joy, *pro se*

Gailon Arthur Joy, *pro se*
Sterling, MA 01564
Tel: (508) 499-6292

and

/s/ Robert Pickle, *pro se*

Robert Pickle, *pro se*
Halstad, MN 56548
Tel: (218) 456-2568

LOCAL RULE 7.1 CERTIFICATE

The undersigned hereby attests that the Defendants have complied with the requirements of Local Rule 7.1 by having, in good faith, through counsel conferred with Plaintiffs, and Plaintiffs' counsel has represented that he opposes this motion.

Dated: April 1, 2010

/s/ Bob Pickle

Bob Pickle

AFFIDAVIT OF SERVICE

Under penalty of perjury, I, Bob Pickle, hereby certify that this document, with accompanying memorandum, affidavit, and exhibits, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 1, 2010

/s/ Bob Pickle

Bob Pickle

WARRANT OF ARREST—FELONY

COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

Fairfax

CITY OR COUNTY

☐ General District Court ☐ Criminal ☐ Traffic
☒ Juvenile and Domestic Relations District Court

Page 1 of 5

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and bring the Accused before this Court to answer the charge that the Accused, within this city or county, on or about **03/20/1993 to 03/19/1994** did unlawfully and feloniously in violation of Section

DATE

18-2-67.1

Code of Virginia:

Commit forcible sodomy by engaging in cunnilingus, with a 12-YEAR-OLD-MALE-CHILD/JUVENILE AT THE TIME OF OFFENSE, who was a child less than 13 years of age.

File 17-cv-40098-RWZ Document 245-1

Ex. H

FAIRFAX COUNTY

JUVENILE & DOMESTIC RELATIONS DISTRICT COURT

I, the undersigned clerk or deputy clerk of the above-named court, authenticate pursuant to Va. Code 8.01-391 (C) on this date that the document to which this authentication is affixed is a true copy of a record in the above-named court, made in performance of my official duties.

DATE **3-22-10**

Clerk/Deputy Clerk

The undersigned, have found probable cause to believe that the Accused committed the offense charged, based on the sworn statements of **Normat, T.M #3201 Fairfax County PD**, Complainant.

02/25/2010 02:02 PM

DATE AND TIME ISSUED

☐ Clerk ☒ Magistrate ☐ Judge
Claude J. Beheler

CCRE is Required TAKE BUCCAL SAMPLE IF LIDS SHOWS NO DNA SAMPLE IN DATA BANK
FORM DC-312 MASTER PAGE ONE OF TWO(1) 12/08 Check if sample previously taken:

Check if sample taken for this arrest:

CASE NO.

JA400083-01-01

ACCUSED:

Sheldon, Tommy, Jr.

LAST NAME, FIRST NAME, MIDDLE NAME

9090 State Route 91 N

ADDRESS/LOCATION

Marion, KY 42064

RACE	SEX	BORN	HT.	WGT.	EYES	HAIR
W	M	MO. DAY YR. 1945	FT. IN. 5 07	165	BRO	GRY

SSN

DL#

STATE

CLASS U FELONY

EXECUTED by arresting the Accused named above on this day:

3-16-10

1211 hrs

DATE AND TIME OF SERVICE

Pre - Guellaco

Arresting Officer

#3694 FCB 029

BADGE NO., AGENCY AND JURISDICTION

for

SHERIFF

Attorney for the Accused:

Short Offense Description (not a legal definition):

SODOMY: VICTIM <13 YRS

Offense Tracking Number:

059JUM1951002160

FOR ADMINISTRATIVE USE ONLY

Virginia Crime Code:

RAP-1133-F9

Hearing Date/Time

3/17/10

Counsel present

5/6/10

9 A.M.

CHAMBERLAIN

4/6

RECEIVED

FEB 25 2010

by 021040

143

**3/18/10 -
Bond motion -
20 T-2/3**

**If released,
must stay
w/ friend
in Va.**

Address above

**No contact
w/ children
under 15
within 15**

Supervised FELONY

Take & ordered

4/10/10

WARRANT OF ARREST—FELONY

COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

CASE NO.

JA 400083-02-01

F

Fairfax

CITY OR COUNTY

☐ General District Court ☐ Criminal ☐ Traffic
☒ Juvenile and Domestic Relations District Court

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and bring the Accused before this Court to answer the charge that the Accused, within this city or county, on or about **03/20/1993 to 03/19/1994** did unlawfully and feloniously in violation of Section **18.2-67.3** **46.1-10** Code of Virginia:

commit aggravated sexual battery by sexually abusing a 12-YEAR-OLD-MALE-CHILD/JUVENILE AT THE TIME OF OFFENSE, who was less than 13 years of age.

FAIRFAX COUNTY

JUVENILE & DOMESTIC RELATIONS DISTRICT COURT

I, the undersigned clerk or deputy clerk of the above-named court, authenticate pursuant to Va. Code 8.01-391 (C) on this date that the document to which this authentication is affixed is a true copy of a record in the above-named court, made in performance of my official duties.

DATE 3-22-10 CLERK/DEPUTY CLERK [Signature]

the undersigned, have found probable cause to believe that the Accused committed the offense charged, based on the sworn statements of **Complainant, T.M. #3201 Fairfax County PD**

02/25/2010 02:04 PM

DATE AND TIME ISSUED

☐ CLERK ☒ MAGISTRATE ☐ JUDGE
Claude J. Beheler

CCRE is Required TAKE BUCCAL SAMPLE IF LIDS SHOWS NO DNA SAMPLE IN DATA BANK FORM DC-312 (MASTER, PAGE ONE OF TWO) 12/08 Check if sample previously taken: _____

Check if sample taken for this arrest: _____

ACCUSED:

Shelton, Tommy, Jr.

LAST NAME, FIRST NAME, MIDDLE NAME

9090 State Route 91 N

ADDRESS/LOCATION

Marion, KY 42064

RACE	SEX	BORN	HT.	WGT.	EYES	HAIR
W	M	MO. DAY YR. 1945	FT. IN. 5 09	165	BRO	GRY

SSN

DL#

STATE

CLASS U FELONY

EXECUTED by arresting the Accused named above on this day:

3-16-10 1212 hrs

DATE AND TIME OF SERVICE

Pfc. Guerrero

Arresting Officer

#3694 Pcd 029

BADE NO. AGENCY AND JURISDICTION

for _____ SHERIFF
Attorney for the Accused: _____

Short Offense Description (not a legal definition):
AGGRAVATED SEXUAL BATTERY: VICTIM <13 YRS

Offense Tracking Number:

059JM1951002161

FOR ADMINISTRATIVE USE ONLY

Virginia Crime Code:

RAP-1121-F9

FELONY

Hearing Date/Time

3/17/10

5/6/10

9/1/10

11/1/10

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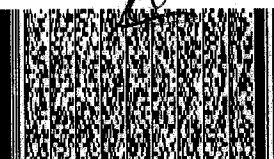
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3/18/2010

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WARRANT OF ARREST—FELONY

COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

Fairfax

CITY OR COUNTY

☐ General District Court ☐ Criminal ☐ Traffic
☒ Juvenile and Domestic Relations District Court

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and

bring the Accused before this Court to answer the charge that the Accused, within this city or county,

on or about 03/20/1993 to 03/19/1994 did unlawfully and feloniously in violation of Section

DATE

18-2-370.1

Code of Virginia:

while being eighteen years of age or over and maintaining a custodial or supervisory relationship with a

18-YEAR-OLD-MALE-CHILD/JUVENILE, a child under the age of eighteen, with lascivious intent, knowingly

and intentionally sexually abuse such child as defined in §18-2-67.10 (6).

FAIRFAX COUNTY

JUVENILE & DOMESTIC RELATIONS DISTRICT COURT

I, the undersigned clerk or deputy clerk of the above-named court, authenticate pursuant to Va. Code 8.01-391 (C) on this date that the document to which this authentication is affixed is a true copy of a record in the above-named court, made in performance of my official duties.

3-22-10

DATE

CLERK/DEPUTY CLERK

Rinnat, T.M. #3201 Fairfax County PD

, Complainant.

02/25/2010 02:08 PM

DATE AND TIME ISSUED

☐ CLERK ☒ MAGISTRATE ☐ JUDGE

Claude J. Beheler

CCRE is Required

FORM DC-312 (MASTER, PAGE ONE OF TWO) 12/08

CASE NO.

J4400083-03-01

ACCUSED:

Shelton, Tommy, Jr.

LAST NAME, FIRST NAME, MIDDLE NAME

9090 State Route 91 N

ADDRESS/LOCATION

Marion, KY 42064

RACE	SEX	BORN	HT.	WGT.	EYES	HAIR
W	M	MO. DAY YR.	FT. IN.	LBS	BRO	GRY
		1945	5 09	165		

SSN

DL#

STATE

CLASS 6 FELONY

EXECUTED by arresting the Accused named above

on this day:

3-16-10

1213 hrs

DATE AND TIME OF SERVICE

PRE. GIVELENO

Arresting Officer

#3694 FEB 029

BADGE NO. AGENCY AND JURISDICTION

for

SHERIFF

Attorney for the Accused:

Short Offense Description (not a legal definition):
INDECENT LIBERTIES: W/CHILD BY PARENT/ETC

Offense Tracking Number:

059JIM1951002162

FOR ADMINISTRATIVE USE ONLY

Virginia Crime Code:

SEX-3635-F6

F

Hearing Date/Time

3/17/10

counsel

start;

5/6/10

9A.M.

CHAMBERS

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BY: 001040

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3/18/2010

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Attorney

FELONY

WARRANT OF ARREST—FELONY
COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

Fairfax
CITY OR COUNTY

☒ General District Court ☒ Criminal ☐ Traffic
☒ Juvenile and Domestic Relations District Court

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and bring the Accused before this Court to answer the charge that the Accused, within this city or county, on or about **05/01/1994 to 09/30/1995** did unlawfully and feloniously in violation of Section

18.2-370.1

Code of Virginia:

while being eighteen years of age or over and maintaining a custodial or supervisory relationship with a 8
189- YEAR-OLD-MALE-CHILD/JUVENILE; AT THE TIME OF OFFENSE, a child under the age of eighteen,
with lascivious intent, knowingly and intentionally sexually abuse such child as defined in §18.2-67.10 [6].

**FAIRFAX COUNTY
JUVENILE & DOMESTIC RELATIONS DISTRICT COURT**

I, the undersigned clerk or deputy clerk of the
above-named court, authenticate pursuant to Va.
Code 8.01-391 (C) on this date that the document to
which this authentication is affixed is a true copy of
a record in the above-named court, made in
performance of my official duties.

DATE

CLERK/DEPUTY CLERK

The undersigned, have found probable cause to believe that the Accused committed the offense
charged, based on the sworn statements of
Fairfax, T.M. #3201 Fairfax County PD, Complainant.

02/25/2010 02:12 PM

DATE AND TIME ISSUED

☐ CLERK ☒ MAGISTRATE ☐ JUDGE
Claude J. Beheler

CCRE is Required
FORM DC-312 (MASTER, PAGE ONE OF TWO) 12/08

CASE NO.

JA400083-04-01

ACCUSED:

Shelton, Tommy, Jr.

LAST NAME, FIRST NAME, MIDDLE NAME

9090 State Route 91 N

ADDRESS/LOCATION

Marion, KY 42064

RACE	SEX	BORN	HT.	WGT.	EYES	HAIR
W	M	MO. DAY YR. 1/1945	5 09	165	BRO	GRY

SSN

DL#

STATE

CLASS 6 FELONY RECEIVED

EXECUTED by arresting the Accused named above
on this day:

3-16-10 1210 hrs

DATE AND TIME OF SERVICE

FR Guendano

Arresting Officer

#3694 FRD 029

BADGE NO., AGENCY AND JURISDICTION

for
Attorney for the Accused: SHERIFF

Short Offense Description (not a legal definition):
INDECENT LIBERTIES: W/CHILD BY PARENT/ETC

Offense Tracking Number:

059GCM1951002163

FOR ADMINISTRATIVE USE ONLY

Virginia Crime Code:

SEX-3635-F6

Hearing Date/Time

3/17/10

Counsel

present,

5/6/10

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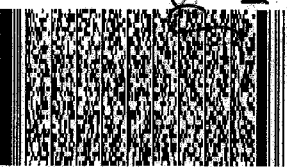
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FELONY

WARRANT OF ARREST - FELONY

COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

Fairfax

CITY OR COUNTY

☐ General District Court ☐ Criminal ☐ Traffic
☒ Juvenile and Domestic Relations District Court

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and bring the Accused before this Court to answer the charge that the Accused, within this city or county, on or about 05/01/1994 to 09/30/1995 did unlawfully and feloniously in violation of Section 18.2-67.3 Code of Virginia:

admit aggravated sexual battery by sexually abusing a 8 to 9 YEAR-OLD-MALE-CHILD/JUVENILE AT THE TIME OF OFFENSE, who was less than 13 years of age.

FAIRFAX COUNTY
JUVENILE & DOMESTIC RELATIONS DISTRICT COURT

I, the undersigned clerk or deputy clerk of the above-named court, authenticate pursuant to Va. Code 8.01-391 (C) on this date that the document to which this authentication is affixed is a true copy of a record in the above-named court, made in performance of my official duties.

DATE 3-22-10 CLERK/DEPUTY CLERK [Signature]

the undersigned, have found probable cause to believe that the Accused committed the offense charged, based on the sworn statements of Turner, T.M. #3201 Fairfax County PD, Complainant.

02/25/2010 02:13 PM

DATE AND TIME ISSUED

☐ CLERK ☒ MAGISTRATE ☐ JUDGE
Claude J. Beheler

CCRE is Required TAKE BUCCAL SAMPLE IF LIDS SHOWS NO DNA SAMPLE IN DATA BANK FORM DC-312 (MASTER, PAGE ONE OF TWO) 12/08 Check if sample previously taken:

CASE NO.

JA 400083-05-01

ACCUSED:

Shelton, Tommy, Jr.

LAST NAME, FIRST NAME, MIDDLE NAME

9090 State Route 91 N

ADDRESS/LOCATION

Marion, KY 42064

RACE	SEX	BORN	HT.	WGT.	EYES	HAIR
W	M	MO. DAY YR.	FT. IN.	LB.	BRO	GRY
		/1945	5 09	165		

SSN

DL#

STATE

CLASS U FELONY

EXECUTED by arresting the Accused named above on this day:

3-16-10 1211 hrs

DATE AND TIME OF SERVICE

The Sweeper

Arresting Officer

#3094 Feb 029

BADGE NO. AGENCY AND JURISDICTION

for

SHERIFF

Attorney for the Accused:

Short Offense Description (not a legal definition):
AGGRAVATED SEXUAL BATTERY: VICTIM <13 YRS

Offense Tracking Number:

059JM1951002164

FOR ADMINISTRATIVE USE ONLY
Virginia Crime Code:

RAP-1121-F9

F

Hearing Date/Time

3/17/10

Arrested

5/16/10

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FELONY

Ex. I

[homepage](#) > [police](#) > [news releases](#):

Sex Assault Victims Come Forward

Fairfax County Police Department
Public Information Office
4100 Chain Bridge Road, Fairfax, Va. 22030
703-246-2253. TTY 703-204-2264. Fax 703-246-4253
[FCPD-PIO@
www.fairfaxcounty.gov/police](mailto:FCPD-PIO@www.fairfaxcounty.gov/police)
News Release: 08/080/2600/BW/(3)
March 18, 2010

Sex Assault Victims Come Forward

McLean Police District – On Tuesday, March 16, Tommy Shelton, 64, of 9090 State Route 91N, Marion, Kentucky, turned himself into Fairfax County Police detectives. Shelton was charged with two counts of aggravated sexual battery, two counts of indecent liberties with a minor, and sodomy.

From 1995 to 2000, Shelton was the pastor for the Community Church of God at 2500 Gallows Road, Dunn Loring. In March 2008, a 27-year-old man contacted police to report that he had been molested by Shelton when he was 12 to 14 years old. In November of 2008, a 22-year-old man contacted police to report that he had been molested by Shelton when he was 8 to 9 years old.

Following an extensive investigation, detectives secured warrants for Shelton in February 2010.

Anyone with information is asked to contact Crime Solvers by phone at 1-866-411-TIPS/8477, e-mail at www.fairfaxcrimesolvers.org or text "TIP187" plus your message to CRIMES/274637 or call Fairfax County Police at 703-691-2131.



Tommy Shelton

Contact Us: [General \(Office of Public Affairs\)](#) | [Technical \(Web Administrator\)](#) | [Directed Inquiries \(County Agencies\)](#)
Phone: **County Main Number** - 703-FAIRFAX (703-324-7329), TTY 711 | [County Phone Listing](#)

[Accessibility](#) | [Awards](#) | [FOIA](#) | [Mobile](#) | [Using this Site](#) | [Web Disclaimer & Privacy Policy](#)

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