

**IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT IN AND  
FOR WAKULLA COUNTY, FLORIDA**

**CIVIL DIVISION**

**UNIVERSAL LIFE CHURCH  
MONASTERY, a Washington  
corporation, and  
GEORGE FREEMAN, an individual**

**CASE NO.:** 192011CA000176CAXXXX

**Plaintiffs,**

**v.**

**MICHAEL CAULEY, individually and  
doing business as UNIVERSAL LIFE  
CHURCH NETWORK AND CHRISTIAN  
ACADEMY,**

**Defendants.**

**COMPLAINT**

Plaintiffs, UNIVERSAL LIFE CHURCH MONASTERY (“ULC”) and GEORGE FREEMAN (“Freeman”), collectively “Plaintiffs,” by and through undersigned counsel sue Defendant MICHAEL CAULEY individually and doing business under the unregistered fictitious name “Universal Life Church Network and Christian Academy” (“Defendant”), and as grounds therefore state:

1. This is an action for damages greater than \$15,000, exclusive of attorneys’ fees, costs, and interest.
2. Plaintiff George Martin Freeman (hereinafter “Freeman”), a/k/a “Brother Martin” and “Martin Freeman,” is a citizen and resident of Seattle, King County, Washington.

3. Plaintiff Universal Life Church Monastery, (hereinafter "ULC"), a/k/a "the Monastery," is a duly incorporated Washington corporation with its principal place of business in Seattle, King County, Washington.

4. Defendant Michael Cauley is a resident of Wakulla County, Florida. (hereinafter "Defendant").

5. Defendant Michael Cauley operates a business in Florida under the unregistered fictitious name "Universal Life Church Network and Christian Academy."

6. From 2006 to September 14, 2010, Defendant was employed by ULC.

7. On September 14, 2010, Defendant's employment with ULC was terminated.

8. Subsequent to Defendant's termination, Defendant began his own online "church," called Universal Life Church Network and Christian Academy.

9. Defendant's "church" is online-only and engages primarily in the business of "ordaining" ministers through an online application process.

10. Despite its claims on its website that the "church academy" offers fully accredited degree programs, Defendant's "Academy" is unknown to the Florida Department of Education, and in fact, Defendant does not actually have an "Academy," whether online or as a physical location.

11. Since Defendant's termination by ULC, Defendant has posted unprivileged, defamatory lies and untruths regarding Freeman and ULC on various websites, including his "church's" online website, [www.ulcnetwork.com](http://www.ulcnetwork.com), and publicly-accessible blogs.

12. These postings were intended to cause embarrassment and damages to ULC and Freeman.

13. Since Defendant's termination by ULC, Defendant has contacted and sent unsolicited emails containing unprivileged material defamatory to ULC and Freeman to ministers ordained by ULC.

14. Defendant's emails to ULC ministers were an attempt to harass Freeman, ULC, and its ministers, and caused embarrassment and damages to ULC and Freeman.

15. ULC and Freeman contacted Defendant and requested Defendant remove all of his online blog entries, posts, and comments containing defamatory lies and untruths regarding ULC and Freeman.

16. Additionally, ULC and Freeman, through undersigned counsel, sent formal notice to Defendant that failure to remove the unprivileged, defamatory comments designed to embarrass and/or damage ULC and Freeman would result in this lawsuit. Copies of notices sent to Defendant are attached as Exhibit A hereto and incorporated herein by reference.

17. Defendant has refused to remove all defamatory comments, posts, blog entries containing untrue comments designed to embarrass and/or damage ULC and Freeman.

18. Freeman and ULC further demanded that Defendant cease and desist posting anywhere online any defamatory statements, lies, and untruths regarding ULC and Freeman; and cease and desist contacting ULC ministers with the same type of communications regarding ULC and Freeman.

19. Through Facebook.com (“Facebook”) Defendant continues to solicit ULC ministers to visit his “church’s” Facebook “page,” which contains defamatory lies and untruths regarding ULC and Freeman. Defendant also continues to email ministers in the ULC through Facebook with defamatory lies and untruths regarding Freeman and ULC.

COUNT I—Defamation on Facebook.com

20. The allegations in paragraphs 1 through 19 above are included herein as if restated in their entirety.

21. Defendant posted multiple false and defamatory statements concerning Freeman and ULC on his Facebook page, a page accessible to anyone, regardless of whether they have a facebook.com account. See Composite Exhibit B, attached hereto and incorporated herein by reference.

22. These statements were unprivileged and were published by Defendant on a page accessible to the public as well as published as a “response” to third-parties.

23. The publication of the statements was intentional and designed to cause embarrassment and or damage to ULC and Freeman.

24. The content of the statements, on their face, renders them actionable “slander per se.”

WHEREFORE, Freeman and ULC demand damages including punitive damages from Cauley, and all other relief this Court deems just.

COUNT II—Defamation on www.ulcnetwork.com

21. The allegations in paragraphs 1 through 19 above are included herein as if restated in their entirety.

22. Defendant posted multiple false and defamatory statements concerning Freeman and ULC on his own website, a publicly accessible site. See Composite Exhibit C, attached hereto and incorporated herein by reference.

23. These statements were unprivileged and were published by Defendant on a page accessible to the public as well as published as a “response” to third-parties’ queries to the “church” on its site.

24. The publication of the statements was intentional and designed to cause embarrassment and or damage to ULC and Freeman.

25. The content of the statements, on their face, renders them actionable “slander per se.”

26. Although the commentary was removed upon issuance of a cease and desist letter to Defendant, multiple publications had already occurred, causing embarrassment and damages to Freeman and ULC.

WHEREFORE, Freeman and ULC demand damages including punitive damages from Cauley, and all other relief this Court deems just.

#### COUNT III – Injunctive Relief

27. Plaintiffs reallege and incorporate herein paragraphs 1 through 26 as if restated in their entirety.

28. Defendant has published and continues to publish defamatory statements regarding Freeman and ULC.

29. Because Defendant’s publications are online and via email and private message to third parties, the nature of the publications is such that Plaintiffs typically could only learn of the publications through vigilant search and monitoring of websites

and through information from third-parties to whom the defamatory statements were communicated.

30. By the time Plaintiffs can learn of the defamation, the harm has been done.

31. The nature of Defendant's online posts/publication is such that Plaintiff is unable to effectively or immediately respond to many of the defamatory statements, rendering the harm irreparable.

32. Furthermore, the nature of the publication renders the harm capable of repetition yet evading review. For example, Mr. Freeman and ULC have no way of knowing to whom or how many times any messages from Cauley may be forwarded to other contacts, further defaming the ULC and Freeman.

WHEREFORE, Plaintiff requests an injunction against Defendant Cauley and his alleged church, "Universal Life Church Network and Christian Academy" from unsolicited contacting of ULC ministers through facebook or email; from publishing any false or misleading statements regarding ULC and Freeman on facebook.com, specifically, and online generally; and from any and all other publications of misleading and false statements regarding Freeman and ULC.

DATE this \_\_\_\_ day of February, 2011.

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