

Complaint for Damages and Injunctive Relief

From: Don Thrasher (donethrasher@yahoo.com)

To: jfloyd@bardstown.com

Cc: jdh@bardstown.com; dickandbobbie@bardstown.com; bethcorbet@bellsouth.net;
bgalexander@bardstowncable.net; sneed.debbie@gmail.com; pgburkot@gmail.com; learef@bardstown.com

Date: Monday, October 21, 2019, 09:57 PM EDT

Jason,

I truly was hoping it was true in your last email that you weren't representing the NCORW and your green light for me to file a complaint with the KREF added to that. The thought of never having to deal with you was such a calming time for me. But like Freddy Kruger from the Nightmare on Elm Street you keep reappearing. Much to my surprise tonight I learn that you are representing a group I am a member of. Apparently you have not gone over all of the legal aspects surrounding the issues which I have raised with the NCORW leadership.

The group has hired you under protest from other members of the NCORW. The Leadership of the NCORW has a fiduciary responsibility to act in the best interests of members like me and Beth Corbett who raised the issue of your representation.

I am contemplating filing a complaint for damages and injunctive relief in the Nelson County Circuit Court for Promissory Estoppel, Breach of Contract, Prima Facie Tort, Breach of Fiduciary Duty and Injunctive Relief to have the current NCORW Leadership removed. You may think that courts don't get involved in political organizations, but they do clubs that raise money under false pretenses. In 2018 I purchased Lincoln Dinner tickets totaling \$105, this year I purchased a \$35 ticket and gave \$120 in the dessert contest which puts the matter above \$250 and eligible for a jury trial.

In my opinion you are an ethically challenged attorney that has no business practicing law. Perhaps you could explain to your clients about promissory estoppel, fiduciary duty, etc. and let them know if you will do all of this for another \$1000. I hope you have lots of free time!

RE: Complaint for Damages and Injunctive Relief

From: Jason Floyd (jfloyd@bardstown.com)

To: donethrasher@yahoo.com

Cc: jdh@bardstown.com; dickandbobbie@bardstown.com; bethcorbet@bellsouth.net;
bgalexander@bardstowncable.net; sneed.debbie@gmail.com; pgburkot@gmail.com; learef@bardstown.com

Date: Tuesday, October 22, 2019, 09:48 AM EDT

One of the great things about this country, Don, is that the courts are open to everyone. You have the absolute freedom to file whatever you wish. Of course, doing that opens you up to the civil rules and subpoena power, where discovery can take place on virtually any aspect of a litigant's life, whether they relate to the substance of the case or not. In fact, the KREF Complaint, if it blossoms into an administrative case, does the exact same thing.

Jason P. Floyd

Managing Partner

FULTON HUBBARD & HUBBARD

117 E. Stephen Foster Ave.

P.O. Box 88

Bardstown, KY 40004-0088

(502) 348-6457

Fax (502) 348-8748

jfloyd@bardstown.com

From: Don Thrasher [mailto:donethrasher@yahoo.com]

Sent: Monday, October 21, 2019 9:58 PM

To: Jason Floyd

Cc: Doug Hubbard; Bobbie Floyd; Beth Corbett; BRENDA ALEXANDER; Debbie Sneed; Paula Burkot; Beth Lear

Subject: Complaint for Damages and Injunctive Relief

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No Mr. Floyd, by virtue of your email in which you are attempting to coerce and intimidate would allow for a protective order. In fact I am on my way to the courthouse to go through every case you have had in the last 10 years and see if the abuse and intimidation that I have heard you have used to victimize people is true. I will investigate and interview your former clients and opponents and compile it all. Clearly this email demonstrates to me you have absolutely no moral or ethical compass.

On Tuesday, October 22, 2019, 09:48:20 AM EDT, Jason Floyd <jfloyd@bardstown.com> wrote:

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chad.mccoy@lrc.ky.gov; chad@mhsattorneys.com

Date: Tuesday, October 22, 2019, 01:36 PM EDT

<https://www.youtube.com/watch?v=F1xAUfdK9FE>

I don't doubt that you will, brother. With no wife, no kids, no job, no faith, no church, and living in your nephew's home rent-free, you have no worries, and plenty of free time to harass Diane Thompson's office. Happy hunting!

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Date: Tuesday, October 22, 2019, 03:19 PM EDT

Oh Jason is that the lies you spread about me? With malice you say I have "no church" and "no faith". What do you base this falsehood on sir? You also know that I am the trustee of the trust that is the equitable owner of the house I reside in, but you further want to give half-truths. As for wishing me "happy hunting" one of the very first cases was one from 2000 where I found Windsor Gardens Operating Agreement, FHF Operating Agreement but more importantly a letter you sent Jeff Hill in that litigation. Interestingly enough you illegally threatened him with contempt because he contacted Uncle Dave. As you recall you did something similar to me when you accused me of violating local rules (which was false). This is a violation of the Rules of Conduct and you simply don't care, you bully, intimidate Alan Brown by inappropriately threatening him with being on the hook for attorneys fees. In my opinion you took advantage of a 90 year old man (Mr. Armstrong) in you pursuit to hurt Brenda, Beth, Alan and me.

Have you no dignity sir?

On Tuesday, October 22, 2019, 01:36:49 PM EDT, Jason Floyd <jfloyd@bardstown.com> wrote:

<https://www.youtube.com/watch?v=FlxAUfdK9FE>

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chad.mccoy@lrc.ky.gov; chad@mhsattorneys.com

Date: Tuesday, October 22, 2019, 04:06 PM EDT

Do you deny that you are not paying rent to your nephew's trust?

Windsor Gardens vs. Geoff Hill (his name is spelled with a "G") was a case I filed after I had been practicing about 3 years, nearly 20 years ago. My memory is fuzzy, but as I recall, he was represented by counsel and I got a judgment against him. Those old operating agreements have long since been replaced.

As for Mr. Brown, as I recall he was in the lobby of the Nelson County Justice Center on June 23, 2014 with Bob Heleringer and others boisterously clapping for me and hailing me as a hero when I successfully obtained an acquittal in a jury trial where his first cousin (?) Jeffrey Baunach (this Jeff starts with a "J") had been charged with multiple counts of sodomy and sexual abuse of an 8 year-old child. So, Mr. Brown only thinks I am a scoundrel when it is for convenient for him, because he thought I did a hell of a job back then. You probably haven't gotten to that case yet. Mr. Baunach, interestingly, subsequent to me getting him acquitted, stiffed me on a \$12,000 bill, and later was caught in a child solicitation sting in Louisville and pled guilty in federal court. I think he is doing a 10+ year stint in the hoosegow.

Speaking of the case where you sued your neighbor because you were butthurt about his tree, did you ever comply with your settlement obligation in that case?

If Mr. Armstrong has a problem with me, being the Christian that he is, he should follow Matthew 18:1 and come on in and see me directly, rather than using you as his puppeteer.

Thank you for the trip down memory lane!

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Date: Tuesday, October 22, 2019, 05:49 PM EDT

See Jason you incorrectly point out the J and the G in Mr. Hills name which I correctly stated was addressed to Jeffrey (you are the one that used J look at your letter). As for consideration to my dads trust yes there is consideration that I am trustee of. As for mr browns relative do you not have a duty to the relative that was your client to not bring the matter into a non related public issue? As for the rest of your contentions it is you sir that needs to read the book of Matthew again. But like your failure to correctly see that you are the one that addressed mr hill as Jeffrey in the letter, it is appropriately representative of this entire email response. Completely specious analysis.

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, October 22, 2019, 4:06 PM, Jason Floyd <jfloyd@bardstown.com> wrote:

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Date: Tuesday, October 22, 2019, 06:18 PM EDT

I didn't say "consideration," I said rent. Are you paying rent for living in the home owned by the Trust which is supposed to be distributed to your nephew in 2-3 years? If I was him, I would want you to maximize the value of my asset, as is required by your fiduciary obligation. Perhaps Judge Kelley should look at this *sua sponte*. Its hard to tell from the file, because you have not filed any periodic returns. I remember in the lawsuit a couple of years ago, you became extremely agitated when I filed that motion to amend my answer to include a counterclaim that named the Trust as a party, since the Trust owned the real estate that was the subject of the litigation. We settled very quickly thereafter, if I recall. Perhaps you can look at it in your review of my public files. You also have not answered whether you complied with the settlement terms in that case. Of course that's a rhetorical question, we both already know that you have not.

You are correct that my letter says "J," probably dictated by me, typed by my secretary, and sent out by me without checking. The lawsuit spells it with a "G" and you've seen it.

I'm not aware of any duty not to discuss a case of public record, particularly when it becomes pertinent to what Alan thought of me just a few short years ago.

What else?

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Date: Tuesday, October 22, 2019, 06:45 PM EDT

Do you not admit that you inappropriately acted against Mr Hill when you threatened contempt? As for any settlement obligations from a case 2 years ago that you allege I didn't fulfill why am I just now hearing about it? As for the Trust take your best shot tough guy. My dad's trust and final requests mean a lot to me, I would expect someone with your character to threaten that.

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