

199-07889-2025
CAUSE NO. _____

EAST PLANO ISLAMIC CENTER, <i>Plaintiff,</i>	§ § § § § § § § §	IN THE DISTRICT COURT COLLIN COUNTY, TEXAS ____ JUDICIAL DISTRICT
v.		
LANDON THURMAN, TESTIMONIES OF GOD, INC., HERITAGE GRACE COMMUNITY CHURCH, INC., JASON OSBORNE, and JOHN DOES 1-20, <i>Defendants.</i>		

**PLAINTIFF’S VERIFIED ORIGINAL PETITION AND REQUEST FOR
DECLARATORY AND INJUNCTIVE RELIEF**

East Plano Islamic Center (“Plaintiff”) respectfully files this Petition and Request for Declaratory Judgment and Injunctive Relief against Defendants Landon Thurman, Testimonies of God, Inc., Heritage Grace Community Church, Inc., Jason Osborne, and John Doe Defendants 1-20 (“Defendants”), seeking redress for Defendants’ nuisance and ongoing violations of the City of Plano’s Ordinance No. 2023-9-18.

INTRODUCTION

Plaintiff operates one of the largest mosques in northeast Texas, located at 4700 14th Street in Plano. While Plaintiff peacefully has operated the mosque for now more than a decade, providing a safe space for thousands of Muslims to exercise their faith, it recently has encountered significant disruption and backlash, including via Defendants—a group of evangelical Christians who patently take issue with Plaintiff’s Islamic services. More specifically, Defendants have made it a now-weekly practice to intentionally disrupt Plaintiff’s prayer service—more specifically, a prayer service called “Jummah” that occurs every Friday in the Islamic faith and that is mandatory for all male Muslims—by blaring anti-Islamic messaging through bullhorns and loudspeakers located

directly outside the windows of Plaintiff's mosque while those prayer services are ongoing. Not only does this activity constitute a nuisance, but it also violates the City of Plano's noise ordinance in a manner plainly designed to disrupt Plaintiff's exercise of their faith pursuant to ongoing religious services. To date, Defendants have refused to voluntarily cease their offending, nuisance-producing behavior, thus necessitating this suit for declaratory and injunctive relief.

PARTIES

1. Plaintiff East Plano Islamic Center is a non-profit tax-exempt organization formed exclusively for education, religious, and social purposes to operate a mosque in Plano, Texas. Plaintiff may be contacted through the undersigned counsel.

2. Defendant Landon Thurman is an individual who is the self-designated founder/president/missionary for Testimonies of God, a Christian evangelical organization whose mission is to "proclaim the gospel." On information and belief, he is a resident and citizen of Redondo Beach, California, who may be served at 2507 Harriman Lane, Apartment 1, in Redondo Beach, California 90278. Citation is hereby requested.

3. Defendant Testimonies of God, Inc. is an evangelical corporation with its principal place of business in Lake Dallas, Texas. It may be served at the address of its registered agent, Republic Registered Agent, LLC, located at 17350 State Highway 240, Suite 220, Houston, Texas 77064. Citation is hereby requested.

4. Defendant Heritage Grace Community Church, Inc. is an incorporated business located at 5475 Coit Road in Frisco, Texas 75035. It may be served at the address of its registered agent, Jairo Nevarez, located at 5475 Coit Road, Frisco, Texas 75035. Citation is hereby requested.

5. Defendant Jason Osborne is an individual who was cited for criminal trespass at Plaintiff's mosque on or about May 16, 2025, due to his active disruption of Plaintiff's religious services

during Jummah in the presence of police officers who were in the area to direct the flow of traffic around the mosque. At present, Mr. Osborne's address is unknown and, as such, citation is not requested at this time.

6. John Doe Defendants 1-20 are individuals whose identity, at present, is unknown, but who are known (based on photographs and videos that have appeared on public sites like Instagram and Facebook) to have actively participated in the disruption of Plaintiff's religious services during the weekly Jummah. As the identity of these individuals is unknown, citation is not requested at this time.

7. As the individuals and organizations who appear at the mosque to disrupt Plaintiff's prayer service change by the week, Plaintiff reserves the right to amend the petition to name additional defendants as their identities become known.

VENUE, JURISDICTION, AND RULE 47(C) STATEMENT

8. This Court has subject matter jurisdiction over this lawsuit because it involves state-law claims and the request for relief is within the jurisdictional limits of this Court.

9. While, on information and belief, Defendant Thurman is a resident and citizen of California, this Court has general and specific jurisdiction over him, as he personally and intentionally reached into the State of Texas to commit a tortious act and violate a local ordinance.

10. Venue is proper in Collin County, Texas, because Collin County is where all or a substantial part of the events or omissions giving rise to Plaintiff's claims occurred. *See* TEX. CIV. PRAC. & REM. CODE § 15.002(a).

11. Plaintiff seeks declaratory and injunctive relief, as well as attendant attorneys' fees and costs. This is relief within the Court's jurisdiction to award pursuant to the Uniform Declaratory Judgment Act and the Court's equitable powers. Plaintiff reserves the right to amend this statement

as discovery progresses and as other claims may be asserted. Plaintiff also seeks such other relief, whether in law or in equity, to which it may show itself justly entitled.

DISCOVERY CONTROL PLAN

12. Plaintiff intends to conduct discovery under Level 2. TEX. R. CIV. P. 190.3.

FACTUAL BACKGROUND

13. Since 2015, Plaintiff has operated a mosque located at 4700 14th Street in Plano, Texas. One of the largest mosques in the area, Plaintiff serves thousands of Muslim individuals, providing religious, educational, and social services to its community.

14. One service Plaintiff provides is a weekly prayer service, Jummah, conducted on Friday afternoons at the mosque. This is a sacred ritual in the Muslim faith, and one that is of utmost importance among Plaintiff's community.

15. Until recently, Plaintiff never had an issue with conducting this prayer service or having its community participate, handling the service from the sanctity of its mosque in a quiet, dedicated, internal space where participants in the prayer service can gather, worship, and pray.

16. In September 2025, however, Plaintiff's weekly prayer services were interrupted by Defendants and those affiliated with Defendants, who have now made it a weekly practice to stand on the sidewalks and lawns outside Plaintiff's mosque with loudspeakers and bullhorns, intentionally disrupting Plaintiff's prayer services with loud evangelical messaging about Christianity and the "teachings of Jesus." Most recently, during Jummah on September 19, 2025, Defendants and those affiliated with them set up a tent, brought external speakers, and came with evangelical pamphlets and signs that they attempted to hand to passers-by, all of whom were attempting to enter the mosque for prayer services.

17. While Plaintiff's leaders have attempted to peacefully request that Defendants refrain from disrupting Plaintiff's prayer services, and on-site police officers who are in the area for traffic control have issued citations for criminal citations, Defendants still steadfastly have refused to cease their conduct and, instead, have made it clear that they will escalate their proselytizing every week until they obtain the reaction the apparently are seeking.

18. Left undeterred, there is little doubt that Defendants—who are acutely aware of where and when Plaintiff's prayer services are held each week—will continue interrupting and disrupting their sacred prayer services with evangelical messaging blared into Plaintiff's mosque in violation of governing noise ordinances.

CAUSES OF ACTION

Common Law Nuisance

19. Plaintiff incorporates the foregoing paragraphs herein by reference.

20. Plaintiff owns and runs the mosque, a religious facility, at 4700 14th Street in Plano, Texas. Plaintiff has a private interest in this property.

21. Defendants have intentionally and substantially interfered with Plaintiff's interest in and use and enjoyment of its property, causing Plaintiff to be unreasonably discomforted, annoyed, and disrupted by Defendants' conduct, especially with respect to Defendants' intentional disruption of Plaintiff's weekly Friday prayer services, Jummah.

22. Defendants created the condition about which Plaintiff complains—namely, by using sound amplification devices, including loudspeakers and bullhorns, to intentionally blare evangelical messaging directly into Plaintiff's mosque while sacred prayer services are being conducted for Plaintiff's community and by setting up a tent directly in the path Plaintiff's community must take

to reach the mosque each Friday, forcing those members to withstand evangelical messaging, pamphlets, and signs simply to get to their mosque to pray.

23. Defendants' conduct has caused injury to Plaintiff and its community by intentionally interfering with and disrupting Plaintiff's religious rituals and prayer services in a manner that makes it extraordinarily difficult, if not outright impossible, for Plaintiff and its community to practice their chosen religion in accordance with their faith, even within the confines of their own private property.

24. By operating in this manner, Defendants have exacted emotional and mental harm on Plaintiff and its community, depriving them of the right to practice their religion in accordance with their beliefs.

Request for Declaratory Relief

25. Plaintiff incorporates the foregoing paragraphs herein by reference.

26. Plaintiff seeks a declaratory judgment pursuant to Chapter 37 of the Texas Civil Practice & Remedies Code declaring Defendants in violation the City of Plano's Ordinance No. 2023-9-18.

27. Ordinance No. 2023-9-18 is a noise ordinance that governs the City of Plano, Texas, including the location of Plaintiff's mosque.

28. Pursuant to Section 14-86 of the Ordinance, it is an "offense for any person to intentionally, knowingly, or recklessly make or cause to be made an unreasonable noise: (1) in a public place, other than sport shooting range; (2) on private property that the person has no right to occupy."

29. Pursuant to Section 14-87(d) of the Ordinance, "a noise is presumed to be unreasonable and declared to be a noise nuisance if it" is "(a) created in a public place . . . adjacent to a . . . religious facility . . . and (b) [is] reasonably likely to interfere with the workings of such institution . . . and

(c) a sign indicating that a . . . religious facility . . . is in the vicinity is posted so as to be visible to motorists, passengers, and pedestrians.”

30. Plaintiff seeks a declaration that Defendants are in violation of these provisions of the noise ordinance. More specifically, Plaintiff seeks a declaration that using sound amplification devices to blare loud messaging inside the walls of Plaintiff’s mosques during sacred prayer services is *per se* unreasonable, as Defendants’ conduct is committed in a public place adjacent to a marked religious facility and is designed to interfere with the workings of that institution in a manner that, in fact, creates such interference.

31. The stated purpose of the Declaratory Judgment Act is to “settle and afford relief from uncertainty and insecurity with respect to rights, status, and other legal relations.” TEX. CIV. PRAC. & REM. CODE § 37.002(b).

32. A declaratory judgment is appropriate where, as here, there is a justiciable controversy about the rights and status of the parties and the requested declaration will solve that controversy. *Bonham State Bank v. Beadle*, 907 S.W.3d 465, 467 (Tex. 1995). To constitute a justiciable controversy, a real and substantial controversy involving genuine conflict of tangible interests must exist. *Id.*

33. Here, Plaintiff presents a ripe justiciable controversy in need of immediate resolution. Left undeterred, Defendants will continue using their sound amplification devices in violation of the governing noise ordinances to interrupt and intentionally disrupt Plaintiff’s religious services and prayer rituals. While Plaintiff has asked Defendants to stop such violations, Defendants have been unwilling to accommodate that request.

34. Plaintiff has retained counsel to represent it in this action. Such representation is costly to Plaintiff, a religious institution that first attempted to resolve this dispute amicably, without resort

to legal action. An award of reasonable and necessary attorneys' fees to Plaintiff would be equitable and just and is authorized by Section 37.009 of the Declaratory Judgment Act.

Request for Injunctive Relief

35. Plaintiff incorporates the foregoing paragraphs herein by reference.

36. Plaintiff seeks a temporary and permanent injunction requiring Defendants to refrain from (a) using sound amplification equipment to blare their messaging around and into Plaintiff's religious institution and (b) attempting to stop Plaintiff's members from entering the mosque and/or handing out evangelical pamphlets, letters, fliers, or other documents offensive to the Islamic faith, especially during Plaintiff's conduct of its weekly Jummah, which Defendants are well aware occurs on Fridays.

37. Plaintiff is entitled to injunctive relief because has suffered and will continue to suffer irreparable harm as a direct result of Defendants' conduct. Among other harms, Defendants' disruptive conduct has prevented Plaintiff from practicing their religion in accordance with their beliefs, especially during the sacred prayer rituals, which Defendants knowingly and intentionally have interrupted.

38. Given Defendants' ongoing violation of the City of Plano's noise ordinances and conduct that amounts to nuisance as a matter of law, Plaintiff has demonstrated a probable right to the relief that it seeks and that it is likely to prevail on the merits of its claims. Defendants have refused to accommodate Plaintiff's simple request to avoid disrupting Plaintiff's prayer services during the time and in the place Defendants know that prayer service is occurring. Unless Defendants are made to stop this offensive behavior, the harms to Plaintiff's practice of their religion and prayer services will remain unsolved.

39. Unless Defendants are enjoined as requested herein, Plaintiff will suffer imminent, probable injury for which there is no adequate remedy at law. Indeed, every time Defendants blast their messaging in and around Plaintiff's mosque during prayer services, Plaintiff's religious freedoms are violated and their prayer services irreparably interrupted in a manner that deprives Plaintiff's community from exercising their beliefs. Money damages are insufficient to compensate this harm, thus justifying injunctive relief.

40. Greater injury would be inflicted upon Plaintiff by the denial of the limited injunctive relief Plaintiff seeks than would be inflicted on Defendants by the granting of this limited injunctive relief.

41. The issuance of an injunction would not disserve the public interest. Balancing the equities and other factors, the significant irreparable harm Plaintiff will continue to experience without injunctive relief, and the lack of harm from the limited injunction Plaintiff seeks, demonstrates that such relief would not disserve the public interest.

42. If necessary and required by law, Plaintiff is willing and able to post a bond. Given the interests at issue, however, Plaintiff requests only a nominal cash bond in the amount of no more than \$100.

43. Following a trial on the merits, Plaintiff requests that any temporary injunction be made permanent.

DEFENSIVE ISSUES

44. All conditions precedent to Plaintiff's right of recovery against Defendants have been performed or have occurred.

RULE 193.7 NOTICE

45. Notice is hereby given that Plaintiff will use any and every document produced by Defendants in response to written discovery against Defendants in any pre-trial proceeding or at trial.

JURY DEMAND

46. Plaintiff hereby demand that this cause be placed upon the jury docket of this Court and thereafter be tried by jury consistent with the Constitution and laws of the State of Texas.

CONCLUSION & PRAYER

47. Plaintiff prays that this Court enter judgment in its favor, award declaratory and injunctive relief, court costs, attorneys' fees, and all other relief, whether in law or in equity, to which Plaintiff may be justly entitled

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF EAST PLANO ISLAMIC
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VERIFICATION

My name is Sameer Siddiqui. I am over the age of eighteen, capable of making this declaration, and fully competent to testify to the matters stated in this declaration. My date of birth is July 12, 1974, and my business address is 1350 Star Ct., Plano, Texas 75074. I am volunteer with the East Plano Islamic Center. I have read the foregoing Original Petition and have personal knowledge through my role with EPIC of the factual statements contained in therein. Those factual statements are true and correct.

Pursuant to Texas Civil Practice & Remedies Code § 132.001, I declare under penalty of perjury that the foregoing statements are true and correct.

Executed in Collin County, State of Texas, on the 1st of October, 2025.

DocuSigned by:
Sameer Siddiqui 10/1/2025
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Sameer Siddiqui

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