

Affidavit

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FRANKLIN COUNTY, COMMON PLEAS COURT
CIVIL DIVISION, COLUMBUS, OHIO
(Court Level and Jurisdiction)

Vergniaud Angrand
933 Chittenden Ave
Columbus, Ohio 43211

(Case I.D. Number)

Plaintiff

-vs-

Ohio Conference of SDA & Ohio Conference
Association of SDA Churches
1251 E. Dorothy Lane Dayton, Ohio 45419

Robert Cundiff
1251 E. Dorothy Lane. Dayton, Ohio 45419

Oswaldo Magana
1251 E. Dorothy Lane. Dayton, Ohio 45419

Arole Joseph,
1251 E. Dorothy Lane Dayton, Ohio 45419

Ebenezer French SDA Church,
1217 Mt Vernon Ave. Columbus, Ohio 43203

Tercius Jean
1217 Mt. Vernon Ave. Columbus, Ohio 43203

Jean Rene Fils-Aime,
1217 Mt. Vernon Ave. Columbus, Ohio 43203

Philadelphie SDA Church,
2169 Ferris Rd. Columbus, Ohio 43224

Lincius Lincifort
2169 Ferris Rd. Columbus, Ohio 43224

Wilkens Bisserette.
2169 Ferris Rd. Columbus, Ohio 43224

Defendants

COMPLAINT

I, Vergniaud Angrand, of Columbus, in Franklin County, Ohio, MAKE OATH AND SAY THAT:

1. Plaintiff, Vergniaud Angrand, states that he was an employee of the Ohio Conference and worked as pastor of Ebenezer French SDA Church in Columbus, OH, where defendants functioned either as superior or associates within the framework of the organization. They have been residents of the state of Ohio for more than 6 months and Plaintiff has maintained a bona fide residence in Franklin County for more than ninety (90) days immediately preceding the filing of this complaint. Plaintiff further states that he had been in an employee relationship with the Ohio conference from September 2002 to July 2024 and in a pastoral relationship with Ebenezer French SDA Church from December 2004 to July 2024. However, this complaint resulted due to Defendants cruelty and egregious disregard for the truth and due process which emanated from reckless accusations, falsity threats, societal isolation, public humiliation coupled with retaliation from 10/2024 - 12/2024
2. Plaintiff further states that he has been subjected to staggering accusations by defendants in willful determination to silence, to slander, to defame his character by falsely accuse him of fraud, mismanagement of institutional funds, illegal use of building of the church where he served from December 2004 to July 2024 as pastor and employee of Ohio Conference.
3. Plaintiff further states that he and defendants were associate leaders in the organization and he served as pastor of Ebenezer French SDA Church. Plaintiff further states that the parties developed common interest in the business and inner working of the institution, of which the nature and extent will be fully disclosed to the court at the time of the hearing hereof.
4. Plaintiff further states that he and defendants have individual and associate interests, of which the nature and extent will be fully disclosed to the court at the time of the hearing hereof. Plaintiff further states and confirms malicious and discriminative behavior in a wrongful discharge by the employer. Plaintiff further complains of staggering accusations by the defendants in reckless disregard for truth to socially isolate, publicly humiliate, defame his character and to falsely accuse him of use of institutional document for personal gain during his tenure at the church where Plaintiff served from December 2004 to July 2024 as an employee of Ohio Conference and Pastor
5. Plaintiff further states that the defendants are faulty of gross negligence, threats, aggression, public humiliation, extreme cruelty, character defamation, slanderous accusations of a) political nature in a spiritual setting and daily functioning and activities of Plaintiff's employment, b) fraud, c) misuse of funds, d) misuse of church documents for personal gain, e) adultery. These slanderous and malicious accusations have caused Plaintiff severe emotional and psychological distress, wrongful termination, societal isolation, loss of reputation within the institution, financial losses, shame and embarrassment.

Wherefore, Plaintiff demands that the defendants, with due diligence, vacate the accusations, repair the name, character, and reputation of Plaintiff in the institution, of such money alone cannot fully address. The reasons and the extent of which will be fully disclosed at the time of the hearing hereof.

Plaintiff further requests a financial relief and equitable reparations to compensate for time, pain, emotional distress, psychological stress, public shame, and isolation in the amount of five hundred thousand dollars (\$500,000) and for negligence, malfeasance, and cruelty, slandering of character and reputation, financial loss, and banishment from the immediate community in the amount of five hundred thousand dollars (\$500,000), for a total of one million dollars (\$1,000,000).


After more than thirty (30) years of service in the SDA institution, Plaintiff did not anticipate such disregard for truth, justice, and due process. Plaintiff was not reprimanded for wrongdoing or given any written notice for propagating erroneous ideas in political contexts. Plaintiff further demands, besides financial relief for future psychological and emotional distress, treatments, for repair of character and reputation, that the institution establishes a platform for pastors and other associates who are victimized by the same allegations--to the extent of shame, embarrassment, isolation, and wrongful termination without due process. Plaintiff further seeks relief from the court that the defendants will be imposed to repair all the wrong done to others in the same context

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STATE OF OHIO

COUNTY OF FRANKLIN

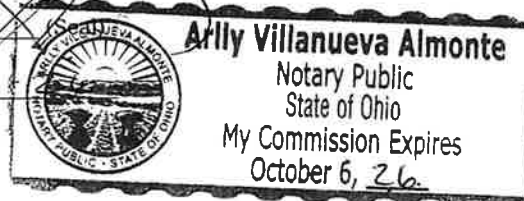

(Signature)

Vergniaud Angrand

SUBSCRIBED AND SWORN TO BEFORE ME, on
the 11 day of JUNE 2025


Signature
NOTARY PUBLIC

My Commission expires: 10-6



CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing is being served via private process server, Sheriff service, and/or Certified mail through the Clerk of Court or via Waiver of service


Vergniaud Angrand

1.