

- FILED -

MAR 15 2022

**Clerk
St. Joseph Circuit Court**

STATE OF INDIANA
ST. JOSEPH COUNTY

IN THE CIRCUIT COURT

Vernado Malone SR
Justice for Michiana
V
Clifton French

Cause # 71C012203 CT 000092

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Vernado Malone, by pro-se, for his Complaint against the Defendant Clifton French, States:

- 1) Plaintiff Vernado Malone Sr. is a resident of St. Joseph County Indiana.
- 2) Defendant Clifton French is a resident believed to reside in St. Joseph County of Indiana.
- 3) Plaintiff is the founder of Justice for Michiana.
- 4) On 10/27/2021 Plaintiff Vernado Malone Mailed and emailed the attach Cease and Desist-Defamation.
- 5) On March 6 2021 Defendant made a real news Michiana post and facebook post that Plaintiff takes and shares naked photos of homicide victims even after telling defendant that a sign consent was given by family and that JFM cases are confidential.
- 6) Defendant has made personal calls to Justice for Michiana Partners to attempt to discourage them from working with Vernado Malone or Justice For Michiana namely Vida Hardley, Toy for Tots, and social Media Partners/Friends from 3/2021 to present.
- 7) Plaintiff has by way of cease and Desist-Defamation to stop his ill actions but as of date he doesn't adhere to such.
- 8) On 2/11/22 Defendant called Plaintiff a "Activit Mob" killing Mr. Malone's character, Mr. Malone is a non-profit community advocate.
- 9) Defendant has falsely said on facebook live that the Attorney office has "**officially announced that they are investigating Vernado Malone**" this was said of facebook live @1 minute into the live on January 18th 2022.
- 10) As of date no "**informal investigation has been opened**" by the Office of the Attorney General on a complaint has been received and pending. The False statement that there is "**A OPEN INVESTIGATION VS PENDING INVESTIGATION**" has been misleading to Vernado Malone community partners and community residents that he serves.
- 11) On Dec. 9th 2021 Defendant calls the Plaintiff a **CLOWN**" on facebook after being served a Cease and Desist. Plaintiff is a human and not a Clown.
- 12) On 11/5/21 Defendant called Plaintiff a **piece of trash** on Facebook with a photo of the Plaintiff.

- 13) Defendant again on Social Media on 10/29/21 alleging Plaintiff on having sex with a minor. Causing harm to Malone's character and reputation .
- 14) Defendant On 10/27/21 on facebook calls Plaintiff a **SEXUAL PREDATOR!!!** The plaintiff has no charges for such.
- 15) Defendant Post that Plaintiff Used Taxpayers money from the city to take nude photos of the dead which was false and caused harm to plaintiff non-profit business.
- 16) A statement is defamatory if it tends "to harm a person's Reputation by lowering the person in the community's estimation or deterring third persons from dealing or associating with the person. See **Kelley vs. Tanoos, 865 N.E.2d 593,596 (Ind. 2007)**
- 17) Defendant falsely Published accusation of sexual predator is defamation.
- 18) Defendant falsely published that the plaintiff is a clown is defamation.
- 19) Defendant falsely published that an ongoing criminal investigation knowing it to be false is defamation.
- 20) Defendant falsely published the defendant is a mob is defamation.
- 21) Plaintiff has been injured by Defendant's defamation
- 22) As a direct and proximate result of the intentional actions of Defendant,the Plaintiff has substantial sustained and,in the future,will continue to sustain,damages which include,but are not limited to:

- A) Past and future damage to plaintiff personal reputation; and**
- B) Past and future damage to plaintiff professional reputation; and**
- C) Past and future economic loss**

WHEREFORE, the Plaintiff Demands:

- 1) Trial by Jury; and**
- 2) The costs of this action; and**
- 3) Full compensatory damages for the injuries sustained;and**
- 4) Punitive damages as allowed by law; and**
- 5) Any and all just and proper relief in the premises.**

Dated:3/15/22


/s/ Vernado Malone Sr

Service

A True copy was emailed to the defendant and a copy was mailed by usps
On 3-15-22

/s/ Vernado Malone

From
Justice For Michiana, INC
Vernado Malone Sr. President
4510 W. Washington St #11
South Bend, IN 46619

Date: 10/27/2021

VIA Certified Mail Overnight Mail Email Facsimile Other: Hand delivered to
Mr. French, Attorney

To
Clifton French
2311 TADSWOOD LANE
SOUTH BEND, IN 46616

Re: Cease and Desist – Defamation

Dear Mr. French (Clifton)

It has come to my attention that you have made a defamatory and false statement about me. The following false statement(s) was made:

Contacting community members and organizations
Spreading stories to discourage them from working
with myself and Justice For Michiana, INC.

The statement(s) was published in social media [Describe how statement was
"published"], and is willfully misleading and without merit because of my past record
and a negatins of wrongful doing [Describe how the statement was misleading].

The false statement(s) that you made is reckless and highly defamatory, and has caused me to suffer. (Check all that apply)

substantial harm
 economic harm
 reputational harm

harm to my business
 harm to my character and reputation
 other: harm to my non profit.

In addition, the false statement(s) has affected me in the following ways: Loss of income,
reputation, partnerships and business relationships.

I hereby demand that you immediately cease and desist from making any and all false and defamatory statement(s) against me. (Check all that apply)

within 3 days of the date of this letter

remove all defamatory statement(s) and content from social media and other media.

publish a retraction

notify me in writing when these tasks have been completed