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December 8, 2016

Dushko Dragojlovic
2411 Vanderbilt Lane, #A
Redondo Beach, CA 90278

Mark Meister
600 Parker Court
Wilimington, DE 19808

William Kurtz
1990 Clyde Road
Cambridge, ON N1R 5S7

**Re: Apostolic Christian Church-Nazarene, Inc. v. Nazarene Congregation,
In the Court of Common Pleas for Lorain County, Ohio,
Case No. 15CV188025**

Dear Sirs:

Together with attorney Alicia Guardia, I represented the Apostolic Christian Church-Nazarene, Inc. at the recent trial in Lorain County Common Pleas Court. Attending the trial on behalf of the corporate entity were Dmytro Popovych and Mike Petras. They, together with Mihal Petras, have asked that I respond to the letters sent them by yourselves on behalf of the Apostolic Christian Church (Nazarene), Elder Committee dated October 24, 2016 and November 30, 2016.

As we are all now well aware, the trustees of the Apostolic Christian Church-Nazarene, Inc. in Columbia Station, Ohio decided on August 31, 2015 to lock the members out of the church. This act, as significant and severe as it was, was taken without prior notice to the church membership or without seeking their input. Those same trustees, Peter Stefan and Traian Mohan, then unilaterally changed the name of the corporation and transferred the title to the church property to the new entity. These subsequent acts were taken for no other reason than to extinguish any rights that the members had to worship in their church, or to participate in the governance thereof. In the eyes of those members who were left standing outside of a locked church, the actions of their trustees represented nothing more than theft of property, theft of religion and theft of their rights as members.

Dushko Dragojlovic
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The locked out members of the church in Columbia Station, Ohio sought guidance from the ACCN Elder Committee on how they should proceed. The ACCN initially sought to intercede on their behalf with Messrs. Stefan and Mohan. Unfortunately, your efforts to communicate with these individuals on any level were either rebuffed or ignored. You then authorized the church members, led by Messrs. Popovych and George Zala, to “[seek] a legal declaration as to the rightful owner of the church property.” This they did, and nothing more. A lawsuit was filed asking the judge to declare the rights of the church members and the trustees with regard to the church property. In this action, the members refrained from asking for monetary damages of any type per your instruction.

Your letter of October 24, 2016 states that you authorized them to seek a “legal declaration” not “civil litigation.” The only way, however, to obtain a legal declaration as to the parties’ respective rights concerning the church property was to file a Complaint in Common Pleas Court and commence, in essence, a litigation. Furthermore, all matters filed in court in the State of Ohio that are not of a criminal nature fall into the category of civil litigation, including declaratory judgment actions. Thus, the members did exactly as the ACCN authorized.

For our clients, this lawsuit was never about “vengeance” or “strife”, or creating further “division” in their church. It is simply about getting back into the building in which they have gathered, prayed, worshipped and financially supported over the last twenty-seven years which was taken from them. The trial has concluded and we are all awaiting the judge’s decision. Once issued, we will receive the “legal declaration” which you authorized.

I cannot say it any other way: your brothers, Dmytro Popovych, Mihal Petras and Mike Petras have not taken any actions beyond those that the Elder Committee authorized in the fall of 2015.

We greatly appreciate your consideration of the foregoing. Please feel free to contact me should you wish to discuss this matter further.

Very truly yours,



Joseph P. McCafferty

JPM:smh

cc: Dmytro Popvych
Mihal Petras
Mike Petras

October 24, 2016

Mihal Petras
7344 Engle Road
Middleburg Heights, OH 44130

Mike Petras
7344 Engle Road
Middleburg Heights, OH 44130

Dmytro Popovych
6895 Tobik Tail
Parma Height, OH 44130

To Mihal Petras, Mike Petras, and Dmytro Popovych.

As we discussed in our meeting at the Brunswick Hills church on the evening of October 1st, this letter is sent to you as formal notification that the Apostolic Christian Church (Nazarene) cannot and will not be party to the legal proceeding you have initiated against Dorel Stefan, Petar Stefan and Traian Mohan. Your actions violate God's Word and bring dishonor to the name of the Lord and His church.

Be advised that neither the Elder Body nor the Elder Committee of our ACCN denomination authorized you to file litigation in the name of our denomination. Further, the Elder Committee was led to believe that the parties involved in the initial dispute over the Columbia Station church building were seeking a legal declaration as to the rightful owner of the church property, not civil litigation. Again, we can have no part in matters such as this and we demand that the ACCN name be withdrawn from the legal proceeding.

This letter was reviewed and unanimously endorsed by the Elder Body of the ACCN denomination in attendance at its meeting on October 15, 2016.

What began as a noble purpose of assisting you in re-opening the Columbia Station church has become a matter of vengeance, strife and division. We beseech you to repent of this wrongdoing and seek the loving mercy of our Heavenly Father.

In Christ,

The Elder Committee on behalf of
The Elder Body of the Apostolic Christian Church (Nazarean)

Apostolic Christian Church (Nazarean)
Elder Committee

September 9, 2015

Dear Bro. Trian Mohan, Bro. Dorel Stefan, and Bro. Peter Stefan:

Greetings in the Name of Christ Jesus our Lord.

It is with deepest regret we must inform you that the three of you are no longer to be considered free brothers within the fellowship of the Apostolic Christian Church (Nazarean).

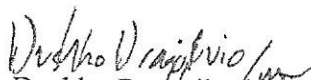
As outlined in our September 2, 2015 letter, this action has become necessary, due to your disregard of our admonition to immediately withdraw all attempts to lock down the Columbia Station church. Sadly, we understand the church locks were changed, thereby denying the assembly of the brethren there this past Sunday.

This discipline is being placed upon you in the fear of God and in keeping with His holy Word (1 Timothy 5:20). It is our fervent and heartfelt prayer that this action will yield the fruit of repentance in your lives leading to full restoration within our ACCN fellowship. Your status as disciplined brothers restricts your ability to offer public prayer and song leading in any ACCN churches in North America. Further, you will be denied from participating in the sacrament of Holy Communion and are to be excused from members' meetings and closed greetings and announcements. In addition, please be aware that you have forfeited your elected positions in the Columbia Station church, such as trustee, treasurer, etc.

Again, dear brothers, we regret the necessity of this action. Be assured of our prayers on your behalf to find God's mercy and grace to open your hearts to the working of His Spirit of correction and comfort in your lives.

Search me, O God, and know my heart: try me, and know my thoughts: and see if there be any wicked way in me, and lead me in the way everlasting. Psalm 139:23-24

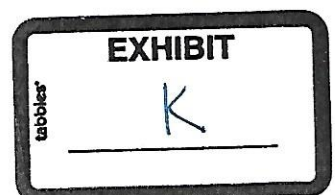
In Christ,


Dushko Dragojlovic


Willy Kurtz


Mark Meister

cc: Ohio Regional Elders
Bro. Moses Magda
Bro. Ted Magda



October 8, 2015

Dear Elder Committee of the ACC Nazarean,

We have received your letter dated September 9, 2015. Our church was founded as an independent church in 1989 and was not recognized or supported as a church by the ACCN and built to never be part of the ACC Foundation. Our church is based on our European Nazarene faith and has always been an independent church. Our church's trustees never requested or approved acceptance into your organization and did not agree to be governed by your elder committee. We did not agree to be listed on your website.

Therefore, we do not recognize the authority of your organization or your Elder Committee over our church or its trustees/officers. You do not have the authority to remove us from our church and we reject any attempt by you to do so as stated in your September 9, 2015 letter.


Due to the irreconcilable differences concerning scriptural teachings/beliefs between our faith and yours, we will reorganize our church and reopen the same as a Nazarene church, but under a new name. In this way there will be no confusion among you that we are not affiliated with your organization. And it shall be clear to all that we are separate from the group of churches identified on your website as being members of your organization and any associated committees that fall under your organization.

Sincerely,



Petar Stefan

Date: 10-8-2015



Dorel Stefan

Date: 10-8-2015