

ALISHA VERRETT

VERSUS

LAKE WELLNESS CENTER, LLC

15<sup>TH</sup> JUDICIAL DISTRICT COURT

LAFAETTE PARISH, LOUISIANA

DOCKET NO.: C-20222436

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**PETITION FOR DAMAGES**

NOW INTO COURT, through counsel, comes Petitioner, Alisha Verrett ("Verrett" or "Petitioner"), a major resident of Lafayette Parish, Louisiana, who respectfully submits:

1.

Made Defendant herein is:

LAKE WELLNESS CENTER, L.L.C. a Louisiana Limited Liability Company, domiciled at 200 Heymann Boulevard, Suite 201, Lafayette, LA 70503, ("LWC").

2.

The Court has jurisdiction over this civil action because the Defendants' actions occurred in Lafayette Parish and Defendants are doing business in Lafayette Parish and Louisiana. This Court is the property venue over this civil action because Plaintiff is domiciled in Lafayette Parish, Defendant is domiciled in Lafayette Parish, and Defendants' actions occurred in Lafayette Parish.

3.

Verrett is a former employee of LWC.

4.

On May 10, 2021, LWC wrongfully terminated Verrett.

5.

The underlying facts of LWC's actions and Verrett's wrongful termination violated Louisiana Whistleblower and Employment Retaliation Laws, Louisiana Employment Discrimination Laws, La. R.S. 23:967, La. R.S. 23:301, et seq., and other applicable laws and statutory provisions.

6.

As a result of the underlying facts of Verrett's wrongful termination and LWC's illegal actions, LWC is liable to Verrett for damages for her mental anguish, humiliation, embarrassment, loss of enjoyment of life, foreseeable and unforeseeable damages, compensatory, nonpecuniary, punitive and exemplary damages, interest, attorney's fees, all costs of these proceedings, as well as any and all equitable damages appropriate in the circumstances..

Verrett demands a trial by jury on all issues so triable herein.

WHEREFORE, Petitioner, Alisha Verrett prays that the Lake Wellness Center, LLC be duly served with a copy of this Petition and cited to appear and answer same through its Registered Agent, Alan Breaud, 420 Oil Center Drive, Lafayette, Louisiana, 70503, and after legal delays and due proceedings had, that there be judgment in favor of Alisha Verrett against Lake Wellness Center, LLC, commiserate with their attributed fault granting all damages requested, in an amount reasonable in the premises, together with legal interest from the date of judicial demand, all costs of these proceedings, attorney's fees, and for any and all general, punitive, and equitable relief deemed appropriate by this Honorable Court.

PETITIONER FURTHER PRAYS for a jury trial on all matters so triable.

Respectfully submitted,



STEVEN G. DURIO (#05230)  
 LAUREN ASHLEY NOEL (#37243)  
**Durio, McGoffin, Stagg & Guidry**  
 220 Heymann Boulevard (70503)  
 Post Office Box 51308  
 Lafayette, LA 70505-1308  
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 lauren@dmsfirm.com  
**ATTORNEYS FOR PETITIONER,**  
**ALISHA VERRETT**

**PLEASE SERVE DEFENDANT:**

LAKE WELLNESS CENTER, LLC  
 through its registered agent for service,  
 ALAN BREAUD  
 420 Oil Center Drive  
 Lafayette, Louisiana 70503

ALISHA VERRETT

VERSUS

LAKE WELLNESS CENTER, LLC ET

15<sup>TH</sup> JUDICIAL DISTRICT COURT

LAFAYETTE PARISH, LOUISIANA

DOCKET NO. C-20222436 (G)

**SECOND AMENDING AND SUPPLEMENTAL PETITION**

The Second amending and supplemental petition of ALISHA VERRETT, domiciled in the Parish of Lafayette, respectfully represents:

Plaintiff desires to supplement her Original and FIRST AMENDING AND SUPPLEMENTAL PETITION TO STATE:

Since the filing of the original petition herein, Plaintiff, ALISHA VERRETT, has learned that she needs to amend and supplement her Original and First amending and Supplemental petition with an additional defendant. Accordingly, Paragraph 1 of the original and First Amending and Supplemental petition filed herein is amended and supplemented to add an additional to read as follows:

1.

Made an additional defendant herein is:

**COLUMBIA CAUSALTY**, a foreign insurance Company authorized to do and doing business in the State of Louisiana; whose agent for service of process is the Louisiana Secretary of State, 8549 United Plaza Blvd., Baton Rouge, Louisiana 70809

MICHELLE FRANQUES, 200 Heyman Blvd. Suite 201, Lafayette, La

LEONARD FRANQUES, 1811 Roper Drive, Scott, La

ROY VIGER, 22 RUE REIMS, MANDERVILLE, LA 70471

MATT ENGLER, 210 Ashton Oaks, Luling, La 70070

LAKE WELLNESS CENTER, L.L.C.;

2.

Plaintiff desires to supplement her petition to add additional facts about her wrongful termination by LAKE WELLNESS CENTER ON MAY 10, 2021.

9.

Leonard Franques, as one of the owners of Lake Wellness Center, L.L.C., personally interviewed job applicants and while he delegated much of the hire and



fire authority and oversight regarding employee compensation to Roy Viger as CEO and Mathew Engler as COO, he maintained executive control over their decisions.

10.

Leonard Franques ultimately made the decision to hire the plaintiff and placed her under the direct supervision and control of Roy Viger as CEO and Mathew Engler as COO.

11.

As an employee, plaintiff reported to her employers, Roy Viger and Matthew Engler, as they had direct supervisory authority over her, with Roy Viger specifically having direct payroll supervision and approval over her compensation as well as all employees of Lake Wellness, LLC.

12.

Even though the plaintiff directly reported to Roy Viger and Matthew Engler, at times, Leonard Franques would call or text her, requiring plaintiff to set up an appointment for one of his friends or his friend's family for treatment. As her ultimate boss and owner of Lake Wellness Center, LLC, plaintiff felt she could not refuse.

13.

An example of one such instance occurred when Mr. Franques directly called upon plaintiff to discuss the treatment, programming and drug testing services for the East Baton Rouge District Attorney's office and the 19<sup>th</sup> JUDICIAL DISTRICT COURT, with Dusty Guidry, an employee of the East Baton Rouge District Attorney's office handling the pre-trial diversion program. Mr. Franques required that plaintiff attend this meeting with him.

14.

Lake Wellness Center held a referral relationship with the East Baton Rouge District Attorney's office and the 19<sup>th</sup> JUDICIAL DISTRICT COURT, through Dusty Guidry, to provide drug screenings, juvenile classes, education, evaluations, programming, and treatment and was required to interact with Dusty Guidry who was the director of the pre-trial diversion and intervention services for the East Baton Rouge District Attorney's office.

15.

The plaintiff felt pressured by Mr. Franques and those in direct supervisory position and control over her, Roy Viger and Matthew Engler, to get all the evaluations, juvenile classes, education, and drug screens out, even without a proper signature if patients had not finished the program or at times failed a drug screen.

16.

In addition to reporting to her direct employers and supervisors, Roy Viger and Matthew Engler, defendant, Leonard Franques, would text the plaintiff if he wanted to know anything about their drug program. Exhibit (3)

17.

Mr. Leonard and his wife Michelle, also an owner of Lake Wellness Center, LLC had several conferences with the plaintiff and requested that she counsel one of their children about a substance use problem the teenager had. Although not licensed to perform counseling, plaintiff felt as she had no choice but to adhere to the company owner's request, which request, was not amended or cancelled by her direct employers, Roy Viger and Matthew Engler.

18.

Roy Viger and Matthew Engler utilized Lake Wellness Center, LLC staff and financial resources for the benefit of their self-interests relating to a company they owned together, Reliable Addiction Care, LLC.

19.

Jeffery Servat and Tyler Ehret went through the drug treatment program and were subsequently hired by Lake Wellness Center, LLC. Messrs. Viger and Engler gave them free room and board at the Sober Living House owned by Reliable Addiction Care, LLC.

20.

In exchange for the free room and board, on many occasions Messrs. Servat and Ehret would leave their paid work assignments on behalf of Lake Wellness Center, LLC to check on clients at the Sober Living Home, collect rent, or transport tenants of the Sober Living Home to appointments. Roy Viger and Matt Engler would send Jeffery Servat and Tyler Ehret driving all over the state and approved overtime and bonuses to be paid by Lake Wellness Center, LLC for work that was clearly not for the benefit of Lake Wellness Center, LLC.

21.

Plaintiff challenged these questionable practices to her direct supervisors, Viger and Engler, regarding bonuses and overtime to be paid to Servat and Ehret. Over plaintiff's objection, Matt Engler approved each questionable benefit and when plaintiff refused to sign the overtime and bonus hours she was fired by Messrs. Viger and Engler.


22.



Plaintiff renews and reiterates all of the allegations (as amended and supplemented herein), and all of the prayers, of Plaintiff's original petition and FIRST AMENDING AND SUPPLEMENTAL PETITION.

WHEREFORE, Plaintiff prays:

1. For all of the relief originally sought in the pray of her original petition and also the relief sought in the FIRST AND SECOND amending and supplemental petition. That this amending and supplemental petition be filed in the record.
2. That due proceedings be had and that there be judgment herein in favor of plaintiff, ALISHA VERRETT and against LAKE WELLNESS CENTER, LLC, LEONARD FRANQUES, MICHELLE FRANQUES, ROY VIGER, MATT ENGLER AND COLUMBIA INSURANCE COMPANY, for all damages as are reasonable in the premises, together with legal interest thereon from original judicial demand until paid, for all costs of these proceedings, attorney's fees, and for such other legal and equitable relief as the Court shall deem necessary and proper.

  
Vyrona M. Wiltz (Bar #13582)  
Attorney for Petitioners  
P.O. Box 216  
Krotz Springs, Louisiana 70750  
(337) 592-0118

PLEASE SERVE:

LAKE WELLNESS CENTER, L.L.C.;  
MICHELLE FRANQUES  
LEONARD FRANQUES  
ROY VIGER  
through their attorney of record Allen Breaud  
420 Oil Center Drive, Lafayette, La 70505

MATT ENGLER 210 Ashton Oaks, Luling, La 70070

**COLUMBIA CAUSALTY**, a foreign insurance Company authorized to do and doing business in the State of Louisiana; whose agent for service of process is the Louisiana Secretary of State, 8549 United Plaza Blvd., Baton Rouge, Louisiana 70809





ALISHA VERRETT

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15<sup>TH</sup> JUDICIAL DISTRICT COURT

LAFAYETTE PARISH, LOUISIANA

DOCKET NO. C-20222436 "G"

**THIRD AMENDING AND SUPPLEMENTAL PETITION**

The THIRD amending and supplemental petition of ALISHA VERRETT, domiciled in the Parish of Lafayette, respectfully represents:

1.

Plaintiff desires to supplement her Original, FIRST and Second AMENDING AND SUPPLEMENTAL PETITION TO STATE:

2.

Plaintiff desires to amend and supplement number 4 of the First amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67 **THEFT** R.S. 14:67 A, B(1) (2) (3) and (4), C AND R.S. 70.1 MEDICAID FRAUD A, B(1) (2) and (3).

3.

Plaintiff desires to amend and supplement number 5 of the First amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67 **THEFT** R.S. 14:67 A, B(1) (2) (3) and (4), C AND R.S. 70.1 MEDICAID FRAUD A, B(1) (2) and (3).

4.

Plaintiff desires to amend and supplement number 6 of the First amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67 **THEFT** R.S. 14:67 A, B(1) (2) (3) and (4), C AND R.S. 70.1 MEDICAID FRAUD A, B(1) (2) and (3).

5.

**NO TRIAL DATE SET**

**STAMPED COPY GIVEN**

Plaintiff desires to amend and supplement number 15 of the SECONDING amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67

**THEFT**

R.S. 14:67 A, B(1) (2) (3) and (4), C        AND  
R.S. 70.1 MEDICAID FRAUD A, B(1) (2) and (3).

6.

Plaintiff desires to amend and supplement number 18 of the SECOND amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67

**THEFT**

R.S. 14:67 A, B(1) (2) (3) and (4), C.

7.

Plaintiff desires to amend and supplement number 20 of the First amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67 **THEFT**  
R.S. 14:67 A, B(1) (2) (3) and (4), C.

8.

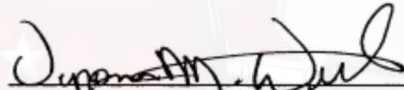
Plaintiff desires to amend and supplement number 21 of the First amending and Supplemental to include: This is a clear violation of Louisiana law R.S. 14:67 **THEFT**  
R.S. 14:67 A, B(1) (2) (3) and (4), C.

9.

Plaintiff renews and reiterates all of the allegations (as amended and supplemented herein), and all of the prayers, of Plaintiff's ORIGINAL, FIRST AMENDING AND SUPPLEMENTAL PETITION AND SECOND AMENDING AND SUPPLEMENTAL PETITION.

WHEREFORE, Plaintiff prays:

1. For all of the relief originally sought in the pray of her original petition and also the relief sought in the FIRST AND SECOND amending and supplemental petition. That this THIRD amending and supplemental petition be filed in the record.
2. That due proceedings be had and that there be judgment herein in favor of plaintiff, ALISHA VERRETT and against all defendants, LAKE WELLNESS CENTER, LLC, LEONARD FRANQUES, MICHELLE FRANQUES, ROY VIGER, MATT ENGLER AND COLUMBIA CAUSALTY INSURANCE CO., for all damages as are reasonable in the premises, together with legal interest thereon from original judicial demand until paid, for all costs of these proceedings, attorney's fees, and for such other legal and equitable relief as the Court shall deem necessary and proper.



Vyrona M. Wiltz (Bar #13582)

Attorney for Petitioners

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CITIZENS FOR A  
*New* Louisiana



PLEASE SERVE:

LAKE WELLNESS CENTER, L.L.C.;  
MICHELLE FRANQUES  
LEONARD FRANQUES  
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through their attorney of record Allen Breaud  
420 OIL CENTER DRIVE  
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