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FILED
ALAMEDA COUNTY

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7 Attorneys for Plaintiff,
8 MOST WORSHIPFUL PRINCE HALL GRAND LODGE,
9 FREE AND ACCEPTED MASONS, STATE OF CALIFORNIA, INC *Younis Arms*

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12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF ALAMEDA
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16 MOST WORSHIPFUL PRINCE HALL)
17 GRAND LODGE, FREE AND ACCEPTED)
18 MASONS, STATE OF CALIFORNIA,)
19 INC.)
20)
21 Plaintiff,)
22)
23 vs.)
24)
25 MOST WORSHIPFUL PRINCE HALL)
26 ARMS, INC.; FREDERICK B. YOUNG,)
27 JR.; and DOES 1 through 100.)
28)
29 Defendants.)

CASE NO. **RG08419241**
COMPLAINT FOR

- 1. CANCEL INSTRUMENT AND QUIET TITLE;
- 2. REMOVE CLOUD ON TITLE;
- 3. FRAUD
- 4. INTENTIONAL MISREPRESENTATION;
- 5. NEGLIGENT MISREPRESENTATION;
- 6. CONCEALMENT; AND
- 7. DECLARATORY RELIEF; PUNITIVE DAMAGE

30 Plaintiff MOST WORSHIPFUL PRINCE HALL GRAND LODGE, FREE AND
31 ACCEPTED MASONS, STATE OF CALIFORNIA, INC ("Grand Lodge"), by and through their
32 attorneys of record herein bring this action against Defendants MOST WORSHIPFUL PRINCE
33 HALL ARMS, INC ("Prince Hall Arms"), FREDERICK B. YOUNG, JR. ("Young"), and DOES
34 1-100 (Prince Hall Arms, Young, and Does 1-100 collectively referred to as "Defendants") as
35 grounds therefore allege as follows:

36 1. Plaintiff Grand Lodge is, and at all times mentioned in this Complaint was,
37 incorporated under the laws of California as a non-profit mutual benefit 501(c)(8) membership
38 organization with its principal place of business located at 9027 S. Figueroa Street, Los Angeles,