

1 50. Defendant Young concealed the information with the intent to defraud and induce
2 Plaintiff to allow him to remain Chairman of the Grand Board, whereby affording him access and
3 opportunity to transfer Plaintiff's interest in the real property described in paragraph 8, and more
4 fully in Exhibit "A" to Defendant Prince Hall Arms, thus allowing Defendant Prince Hall Arms
5 to receive the loan proceeds for its own use. Defendant Young intended for Plaintiff to rely on
6 his concealment of the title transfer and to allow him to remain Chairman so that he could
7 execute the transfer and take out the loan against the PROPERTY for Defendant Prince Hall
8 Arms' sole benefit.

9 51. Plaintiff did rely on Defendant Young's concealment. At the time Defendant
10 Young executed the BERKELEY GRANT DEED, while simultaneously serving on both
11 Plaintiff's Grand Lodge's board and Defendant's Prince Hall Arms' board, Plaintiff did not know
12 Defendant Young was concealing the BERKELEY GRANT DEED. Had Plaintiff known of
13 Defendant Young's intent to transfer title of the PROPERTY to Defendant Prince Hall Arms and
14 take out a \$600,000 loan against the PROPERTY without just compensation or consideration,
15 Plaintiff would not have authorized him to do so or remain Chairman of the Grand Board.

16 52 Plaintiff did not receive any proceeds or consideration from the title transfer or the
17 loan Defendant Young and Defendant Prince Hall Arms fraudulently procured.

18 53. As a direct and proximate result of the fraudulent conveyance of the grant deed,
19 Plaintiff has been damaged in an amount not yet ascertained and leave will be sought to amend
20 this Complaint to set forth such amount when ascertained or proved at trial.

21 54. Defendants knew that the BERKELEY GRANT DEED was false, fraudulent and
22 void and they paid no consideration and accepted same with the intent to defraud Plaintiff.
23 Defendants' acts were intentional, outrageous, malicious and fraudulent and Plaintiff, therefore,
24 seeks exemplary and punitive damages in the amount of \$2,500,000.

25 **V.**

26 **FIFTH CAUSE OF ACTION AGAINST DEFENDANT YOUNG**
27 **FOR NEGLIGENT MISREPRESENTATION**

28 55. Plaintiff incorporates by reference each and every allegation set forth in the above