10. Defendant Young was a member of the Masons for more than 36 years. Defendant Young has served on the Grand Board of Plaintiff Grand Lodge for several years. Defendant Young was elected Chairman of the Grand Board for the 2006-2007 term and served as Chairman for the previous three years. While Defendant Young was the Chairman of the Grand Board for the 2006-2007 term, he was also a board member of Defendant Prince Hall Arms. Defendant Young was the principal incorporator of Defendant Prince Hall Arms.

11. According to the Masonic Constitution, the Grand Board is empowered to acquire, hold, mortgage, execute a trust deed, sell and otherwise dispose of real property of Plaintiff Grand Lodge. (Masonic Constitution, Part II, Art. XVI, § 1.) In so doing, however, the Grand Board has a duty to make a detailed report of their activities and business transactions for the past year to the Grand Master and Plaintiff Grand Lodge at its Annual Communication. (Id.) The Grand Board must always be consulted on all business transactions that involve property and finances which are binding on Plaintiff Grand Lodge. (Masonic Constitution, Part II, Art. XVI, § 6.H.) And under no circumstance may an elected officer or member of the Grand Board enter into any pecuniary contracts or do business on behalf of Plaintiff Grand Lodge, unless first authorized, in writing, by a majority of the Grand Board, or with the consent of Plaintiff Grand Lodge. (Masonic Constitution, Part II, Art. XVI, § 11.) Unless these conditions and duties are satisfied, neither the Grand Board nor any member thereof may acquire, mortgage, sell, or otherwise dispose of any real property of Plaintiff Grand Lodge.

I.

FIRST CAUSE OF ACTION AGAINST ALL DEFENDANTS

TO CANCEL INSTRUMENT AND QUIET TITLE BASED ON FRAUD

12. Plaintiff incorporates by reference each and every allegation set forth in the above paragraphs as if set forth in full herein, except those paragraphs, if any, which are inconsistent with this cause of action to quiet title.

13. Defendant Young developed an elaborate scheme to transfer title to the PROPERTY from Plaintiff Grand Lodge to Defendant Prince Hall Arms. Defendant Prince Hall Arms is a sister corporation of Plaintiff Grand Lodge. Defendant Young was Defendant Prince