

1 Hall Arms' principal incorporator. Defendant Young attempted to assure himself control of the  
2 boards of both Plaintiff Grand Lodge and Defendant Prince Hall Arms. While Chairman of the  
3 Grand Board for the 2006-2007 term, Defendant Young also served on the board of Defendant  
4 Prince Hall Arms'. On or about March 22, 2006, Defendant Young, allegedly in his capacity as  
5 Grand Board Chairman, executed a grant which transferred Plaintiff's PROPERTY to Defendant  
6 Prince Hall Arms ("BERKELEY GRANT DEED"). Plaintiff did not at any time receive any  
7 payment or consideration whatsoever for the BERKELEY GRANT DEED or for the real  
8 property reportedly conveyed. At that time and all relevant times Defendant Young was not  
9 authorized to execute a transfer of the PROPERTY because at no time did Defendant Young ever  
10 satisfy the conditions set forth in the Masonic Constitution that would have granted him authority  
11 to do so. Defendant Young obtained for Defendant Prince Hall Arms apparent record title by  
12 fraudulently presenting himself as an authorized agent of Plaintiff Grand Lodge.

13 14. At no time did Defendant Young consult the Grand Board prior to executing the  
14 BERKELEY GRANT DEED. (*See* Masonic Constitution, Part II, Art. XVI, § 6.H.) At no time  
15 did Defendant Young obtain written authorization from a majority of the Grand Board or consent  
16 from Plaintiff Grand Lodge to execute the BERKELEY GRANT DEED on behalf of Plaintiff.  
17 (*See* Masonic Constitution, Part II, XVI, § 11.) And at no time did Defendant Young make a  
18 detailed report of the BERKELEY GRANT DEED to the Grand Master or Plaintiff Grand Lodge.  
19 (*See* Masonic Constitution, Part II Art. XVI § 1.) Thus, Defendant Young was never authorized  
20 to transfer Plaintiff's PROPERTY to Defendant Prince Hall Arms.

21 15. Defendant Young was a Mason for over 36 years. Defendant Young received a  
22 copy of the Masonic Constitution. Defendant Young was required to be and should be well  
23 versed in the Masonic Constitution, the rules and regulations, written and unwritten laws and  
24 customs of the Masons. Moreover, Defendant Young was a member of the Grand Board for  
25 several years, was elected as the Grand Board Chairman for the 2006-2007 term and served as the  
26 Chairman for the previous three years. Defendant Young knows or should have known that he is  
27 required to obey and follow the Masonic Constitution, even as the Chairman of the Grand Board.  
28 Defendant Young had or should have had full knowledge that he was violating the Masonic