

1 27. The BERKELEY GRANT DEED is now in the possession of and under the
2 control of defendants Prince Hall Arms and Frederick Young and was recorded in the office of
3 the County Recorder, state of California, on or about April 14, 2006, as document number
4 2006149879, official records of Alameda County, California, (Exhibit “B”).

5 28. The BERKELEY DEED OF TRUST is now in the possession of and under the
6 the control of defendants Prince Hall Arms and Frederick Young and was recorded in the office
7 of the County Recorder, state of California, on or about April 4, 2007, as document number
8 2007130961, official records of Alameda County, California, (Exhibit “C”).

9 29. On its face, the BERKELEY GRANT DEED is apparently valid, but as to Plaintiff
10 the deed is invalid and void in that the estate or interest in and to the PROPERTY claimed by
11 Defendant Prince Hall Arms is false and fraudulent and is based upon a false and unauthorized
12 deed purportedly executed, acknowledged and signed by an authorized agent of Plaintiff Grand
13 Lodge and delivered to Defendant Prince Hall Arms.

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

17 31. Defendant Young and Defendant Prince Hall Arms knew that the BERKELEY
18 GRANT DEED was false, fraudulent and void and they paid no consideration, therefore, and
19 accepted same with the intent to defraud Plaintiff. Defendants’ acts were intentional, outrageous,
20 malicious and fraudulent. Plaintiff therefore seeks exemplary and punitive damages in the
21 amount of \$2,500,000.

22 **II.**

23 **SECOND CAUSE OF ACTION AGAINST ALL DEFENDANTS**

24 **TO REMOVE CLOUD ON TITLE**

25 32. Plaintiff incorporates by reference each and every allegation set forth in the above
26 paragraphs as if set forth in full herein, except those paragraphs, if any, which are inconsistent
27 with this cause of action to remove cloud on title.

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