

MOUNTAIN OF FIRE AND MIRACLES * IN THE
MINISTRIES *
(A Nevada Non-Profit Corporation) * CIRCUIT COURT

c/o: Gilbert A. Garcia * FOR
5861 Pine Avenue, Suite B *
Chino Hills, California 91709 * PRINCE GEORGE'S COUNTY

And * CASE NO.: CAL16-26532

MOUNTAIN OF FIRE AND MIRACLES, *
INTERNATIONAL *
A Religious Association *

c/o: Gilbert A. Garcia *
5861 Pine Avenue, Suite B *
Chino Hills, California 91709 *

Plaintiffs *

v. *

CHRIST THE TRUTH MINISTRIES, INC. *
5506 Church Road *
Bowie, Maryland 20720 *

SERVE ON: *
Kayode Ojewale, Resident Agent *
9520 Georgian Way *
Owings Mills, Maryland 21117 *

And *

MOUNTAIN OF FIRE AND MIRACLES *
MINISTRIES MARYLAND, *
INCORPORATED *
(A Maryland Religious Corporation) *
5506 Church Road *
Bowie, Maryland 20720 *

SERVE ON: *
Christopher Akinduro, Resident Agent *
5506 Church Road *
Bowie, Maryland 20720 *

And *

LAWRENCE OLUKUNMI *
ADETUNJI *
12806 Maidenwood Terrace *
Beltsville, Maryland 20705 *

And *

KAYODE OJEWALE *
9520 Georgian Way *
Owings Mills, Maryland 21117 *

And *

ELERA NWOGU *
2512 Nicol Circle *
Mitchellville, Maryland 20721 *

And *

EMILOLA OKE *
9701 Apollo Drive, Suite 301 *
Largo, Maryland 20774 *

And *

KOFFI POSSIAN *
1310 Fatima Place *
Landover, Maryland 20785 *

And *

MIRIAM A. MORGAN *
7803 Desen Drive *
Lanham, Maryland 20706 *

And *

QUADRI ADELEKE *
7321 Powhayan Street *
Lanham, Maryland 20706 *

And *

RAYMOND AWOSIKA	*
1623 Winesapp Drive	
Odenton, Maryland 21113	*
And	*
BEATRICE M. BOATENG	*
97170 Bridgeway	
Mitchellville, Maryland 20721	*
And	*
CHRISTOPHER O. AKINDURO	*
13626 Wood Ember Drive	
Upper Marlboro, Maryland 20774	*
And	*
ISRAEL O. ADETUNJI	*
12806 Maidenwood Terrace	
Beltsville, Maryland 20705	*
And	*
RONKE O. ADETUNJI	*
12806 Maidenwood Terrace	
Beltsville, Maryland 20705	*
And	*
ESTHER A. ADETUNJI	*
12806 Maidenwood Terrace	
Beltsville, Maryland 20705	*
Defendants	*
* * * * *	

**COMPLAINT FOR DECLARATORY RELIEF
AND FOR DAMAGES
AND PETITION TO ASSUME JURISDICTION**

Plaintiffs and Petitioners, MOUNTAIN OF FIRE AND MIRACLES MINISTRIES

USA, INC. and MOUNTAIN OF FIRE AND MIRACLES MINISTRIES, by its Attorneys, FERGUSON, SCHETELICH & BALLEW, P.A., Thomas J. Schetelich and Rafiq R. Gharbi, bring this action complaining against CHRIST THE TRUTH MINISTRIES, INC., MOUNTAIN OF FIRE AND MIRACLES MINISTRIES MARYLAND, INC. and LAWRENCE OLUKUNMI ADETUNJI, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM A. MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE M. BOATENG, CHRISTOPHER O. AKINDURO, ISRAEL O. ADETUNJI, RONKE O. ADETUNJI and ESTHER A. ADETUNJI.

This legal action is for declaratory relief, compensatory damages, punitive damages, and equitable relief.

GENERAL ALLEGATIONS

1. MOUNTAIN OF FIRE & MIRACLES MINISTRIES (“MOFMM, INTERNATIONAL”) is an international association of churches originally established in Nigeria.

2. MOUNTAIN OF FIRE AND MIRACLES MINISTRIES, USA, INC. (“MOFMM, USA”) is a Nevada non-profit corporation created by MOFMM, INTERNATIONAL for the purposes of advancing the ministry of MOFMM, INTERNATIONAL in the United States, holding assets for the use of the MOFMM, INTERNATIONAL ministries in the United States, coordinating the legal financial relations of Mountain of Fire and Miracles Ministries churches in the United States, and being the beneficiary of all real and personal property of such churches that disassociate themselves with MOFMM, INTERNATIONAL.

3. MOUNTAIN OF FIRE AND MIRACLES MINISTRIES, MARYLAND, INC. ("MOFMM, MARYLAND") is a Maryland religious corporation originally formed under the name of "Mountain of Fire & Miracles Ministries" and which filed Articles of Amendment on May 23, 2002 changed its name to "Mountain of Fire & Miracles Ministries, Maryland, Inc."

4. MOFMM, INTERNATIONAL is a hierarchical religious denomination. Its religious purpose is the propagation of the full gospel of Jesus Christ throughout the world; to encourage believers to receive the baptism in the Holy Spirit and Fire, and to lead people to personal saving faith in the Lord.

5. MOFMM, INTERNATIONAL, of which MOFMM, MARYLAND was a part, has a central governing body that acted regularly within its powers. MOFMM, INTERNATIONAL is directed by a General Overseer who is Dr. D.K. Olukoya. The ministry is directed through a series of Regional Overseers, who oversee the local churches.

6. MOFMM, MARYLAND took title to property known as 5506 Church Road, Bowie, Maryland by deed dated August 16, 2001. This property consists of 12 acres (more or less) on which is constructed a church building, parking lot, and other improvements.

7. MOFMM, MARYLAND took title to the real property known as 5503 Church Road Bowie, Maryland by deed dated September 29, 2004. This property consists of 1.3 acres (more or less) on which is constructed a single family home.

8. MOFMM, MARYLAND since its formation has accumulated substantial tangible personal property including building furnishings, supplies, books, records,

vehicles, home and office equipment, appliances, equipment for use in the ministry, and other tangible personal property.

9. MOFMM, MARYLAND since its formation, has acquired substantial intangible property including bank accounts and investment accounts.

10. All of the real property, tangible personal property, and intangible personal property, held by MOFMM, MARYLAND was held in trust for MOFMM, INTERNATIONAL and specifically for the beneficiary MOFMM, USA.

11. The terms of the trust were established by the documents of MOFMM, INTERNATIONAL, and accepted by MOFMM, MARYLAND as detailed in the allegations following.

12. In 2002, General Overseer Olukoya distributed a written direction from the International Headquarters of MOFMM, INTERNATIONAL, requiring local pastors to submit affidavits declaring their loyalty to the ministry, stating "they hold the church for and on behalf of the MFM headquarters" and that "under no situation will they split the congregation, seize its assets, or handle the church as a personal property." LAWRENCE OLUKUNMI ADETUNJI, Defendant, was the Pastor of MOFMM, MARYLAND and subscribed and swore to the statement on October 28, 2002.

13. On November 8, 2002, LAWRENCE ADETUNJI signed a General Agreement including that he would "hold this church in trust for and on behalf of Mountain of Fire & Miracles Ministries."

14. On October 27, 2012, MOFMM, USA issued a letter of appointment to Pastor LAWRENCE ADETUNJI, appointing him as Pastor of Bowie, Maryland Branch of

MOFMM, INTERNATIONAL. Pursuant to the terms of the appointment, LAWRENCE ADETUNJI would be responsible to his Regional Overseer and to General Overseer Olukoya.

15. The appointment required LAWRENCE ADETUNJI to strictly adhere to and obey all the policies, procedures, rules and regulations governing the Mountain of Fire Ministries established by the General Overseer. He further agreed that “all records of the accounts of your Branch, records, books, programs, whether maintained in physical or electronic media, relating in any manner to Mountain of Fire and Miracles Ministries, including without limitation, credit reports or memoranda, reports of transactions made on behalf of the Branch, demographic or economic data whether prepared by the Branch or otherwise coming into the Branch’s possession, should be the exclusive property of Mountain of Fire and Miracles Ministries, U.S.A., regardless of who actually purchased the original book or record.”

16. The appointment further required LAWRENCE ADETUNJI that “all such books, records and computer files shall be immediately returned to Mountain of Fire and Miracles Ministries, U.S.A., by the Branch on any termination or succession (sic) of the Branch from Mountain of Fire and Miracles Ministries, U.S.A.” The letter of appointment further stated that he would “hold this Branch, this Church, and all its property in trust for and-on-behalf of Mountain of Fire and Ministries, U.S.A.”

17. The appointment letter of October 27, 2012 was signed by LAWRENCE ADETUNJI under oath, in which he affirmed his loyalty to MOFMM, INTERNATIONAL and MOFMM, USA; and that he would guide and oversee MOFMM, MARYLAND to

assure that “the Corporation and its Officers will hold this Church and its property in trust for and on behalf of Mountain of Fire and Miracles Ministries U.S.A.”

18. The appointment letter signed by LAWRENCE ADETUNJI stated that “should I decide to withdraw as a pastor of Mountain of Fire and Miracles Ministries, I shall give the General Overseer and the Regional Coordinator a minimum of thirty (30) days’ notice of my intent to withdrawal.”

19. On March 8, 2014, MOFMM, MARYLAND amended its By-laws to state that “it shall conduct all business in accordance with the directions, instructions, constitutions, cannons (sic) and rules of Mountain of Fire and Miracles Ministries International and its General Overseer.”

20. The same amended By-laws provided that “the property of Mountain of Fire and Miracles Ministries, Maryland Inc. a Maryland non-profit Corporation is hereby held in trust on behalf and in favor of Mountain of Fire & Miracles Ministries International and the General Overseer Daniel Kay Olukoya, by the Unites States Headquarters, Mountain of Fire and Miracles Ministries, Inc. a Nevada non-profit Corporation.”

21. The same amended By-laws stated that “Mountain of Fire and Miracles Ministries, Maryland Inc., a Maryland non-profit Corporation hereby recognizes and agrees that any and all property held in trust on behalf of Mountain of Fire and Miracles Ministries International shall be, upon reasonable request or upon the winding up or dissolution of this Corporation be provided to and turned over to Mountain of Fire and Miracles Ministries, Inc., a Nevada non-profit Corporation. It is further known and understood that Mountain of Fire and Miracles Ministries International and/or the General

Overseer and/or any other person designated by Mountain of Fire and Miracles Ministries International and/or the General Overseer may appoint, assign or select any person on behalf of the International Ministry, to accept any and all properties held in Trust on behalf of Mountain of Fire and Miracles Ministries International”.

22. On March 8, 2014, MOFMM, Maryland amended and restated its Articles of Incorporation, including adding a new Article Five which stated that upon the winding up and dissolution of the religious corporation, its assets “shall be distributed to Mountain of Fire and Miracles Ministries International by and through the International Ministries United States Headquarters, Mountain of Fire and Miracles Ministries Inc. a Nevada non-profit Corporation.”

23. The same Restated Articles of Incorporation contained an Article Six, which stated that the “real or personal assets, and money are held in trust for the benefit of Mountain of Fire and Miracles Ministries, International by and through its headquarters in the United States, its Nevada non-profit Corporation named Mountain of Fire and Miracles Ministries Inc., a Nevada Corporation.”

24. The same Restated Articles of Incorporation contained an Article Seven which stated: “On dissolution, for whatever reason, all assets remaining after payment of the debts of the Corporation shall be distributed to Mountain of Fire and Miracles Ministries International, through its headquarters in the United States, Mountain of Fire and Miracles Ministries Inc., a Nevada non-profit corporation.”

25. The same Restated Articles of Incorporation required that certain actions must be pre-approved in writing by MOFMM, INTERNATIONAL before they can

become effective: Amending or Restating the Articles of Incorporation; Amending, Adopting, or Repealing the By-laws of the Corporation; and dissolving the Corporation.

26. The Restated Articles of Incorporation were adopted on March 8, 2014, and were filed with the Maryland State Department of Assessments and Taxation on April 22, 2014.

27. In 2015, Defendants LAWRENCE ADETUNJI, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM A. MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE M. BOATENG, CHRISTOPHER O. AKINDURO, ISRAEL O. ADETUNJI, RONKE O. ADETUNJI, and ESTHER A. ADETUNJI agreed between them to deprive MOFMM, INTERNATIONAL and MOFMM, USA of their interest in the real property, tangible personal property, and intangible personal property belonging to MOFMM, MARYLAND, to transfer the same real property, tangible personal property, and intangible personal property to another religious corporation under their control, and to deprive the congregation of MOFMM, MARYLAND, MOFMM, INTERNATIONAL, and MOFMM, USA of the assets held in trust for them.

28. On or about December 18, 2015, in furtherance of their conspiracy, Defendants OJEWALE, AKINDURO, NWOGU, OKE, POSSIAN, MORGAN, ADELEKE, AWOSIKA, and BOATENG, being Trustees of MOFMM, MARYLAND, executed Articles of Amendment and Restatement of MOFMM, MARYLAND. The purpose of these amendments was to eliminate the obligation of MOFMM, MARYLAND and its Trustees to hold the real property, tangible personal property, and intangible

personal property of the religious corporation in trust for the benefit of MOFMM, INTERNATIONAL and MOFMM, USA.

29. On December 18, 2015, in furtherance of their conspiracy, Defendant LAWRENCE ADETUNJI filed the December, 2015 Articles of Amendment and Restatement with the Maryland State Department of Assessments and Taxation.

30. The December, 2015 Articles of Amendment and Restatement were not approved by nor submitted for approval to MOFMM, INTERNATIONAL or MOFMM, USA, and were concealed from them by these Defendants.

31. The December, 2015 Articles of Amendment and Restatement were not approved by nor submitted for approval to the congregation of MOFMM, MARYLAND, and were concealed from it by these Defendants.

32. The December, 2015 Articles of Amendment and Restatement were ineffective to revoke the trust established for the benefit of MOFMM, INTERNATIONAL and MOFMM, USA.

33. On January 4, 2016, in furtherance of the conspiracy, Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI filed Articles of Incorporation for a religious corporation known as CHRIST THE TRUTH MINISTRIES, INC. These Defendants named themselves as the Trustees of CHRIST THE TRUTH MINISTRIES, INC.

34. On January 4, 2016, in furtherance of the conspiracy, CHRIST THE TRUTH MINISTRIES registered the tradename "Calvary House, Bowie" with the

Maryland Department of Assessments and Taxation.

35. On Sunday, March 27, 2016, in furtherance of the conspiracy and in breach of his duties of trust, Defendant LAWRENCE ADETUNJI announced to the congregation of MOFMM, MARYLAND that the church would no longer be part of MOFMM, INTERNATIONAL but would now be an independent church under the name CHRIST THE TRUTH MINISTRIES.

36. On March 27, 2016, in furtherance of the conspiracy, the individual Defendants had the church signs bearing the name "Mountain of Fire Ministries" removed or changed to "Christ the Truth Ministries."

37. On March 28, 2016, in furtherance of the conspiracy, Defendant LAWRENCE ADETUNJI filed a tradename application for which he claimed personal ownership of the name "Mountain of Fire & Miracles Ministries of Bowie, Maryland."

38. By the letter of March 30, 2016, MOFMM, USA, through its legal counsel Gilbert Garcia, demanded that the defendants cease and desist in their wrongful conduct, and convey all property pursuant to the terms of the trust and the valid corporate documents.

39. No substantive response has been received in response to the letter of March 30, 2016.

40. The real property located at 5503 and 5506 Church Road, Bowie remains titled to MOFMM, MARYLAND and has never been distributed by its Trustees or to MOFMM, USA despite demand.

41. The real property located at 5503 and 5506 Church Road, Bowie is being

used by CHRIST THE TRUTH MINISTRIES and the individual Defendants, in violation of the rights of MOFMM, USA and MOFMM, INTERNATIONAL, without compensation to these Plaintiffs.

42. The tangible personal property of MOFMM, MARYLAND has never been distributed by its Trustees to MOFMM, USA despite demand.

43. The tangible personal property located at 5503 and 5506 Church Road, Bowie is being used by CHRIST THE TRUTH MINISTRIES and the individual Defendants, in violation of the rights of MOFMM, USA and MOFMM, INTERNATIONAL, without compensation to those Plaintiffs.

44. The intangible personal property of MOFMM, MARYLAND has never been accounted for, or distributed to MOFMM, USA, despite the demand.

45. The intangible personal property of MOFMM, MARYLAND was taken by CHRIST THE TRUTH MINISTRIES and the individual Defendants, for their own benefit and enrichment.

**COUNT ONE
DECLARATORY JUDGMENT
AGAINST DEFENDANTS CHRIST THE TRUTH
MINISTRIES AND MOFMM, MARYLAND**

46. The allegations of Paragraphs 1 through 45 of this Complaint and Petition are incorporated as if restated herein.

47. This action is brought pursuant to Maryland Code, Courts and Judicial Proceedings Article, Title Three, Subtitle Four, for Declaratory Judgment.

48. MOFMM, INTERNATIONAL and MOFMM, USA have an interest in the real property, tangible personal property, and intangible personal property, titled in

MOFMM, MARYLAND.

49. An actual controversy exists, antagonistic claims are present as between the parties, and the Plaintiffs are asserting a legal status, right, and privilege that is challenged or denied by the Defendant CHRIST THE TRUTH MINISTRIES concerning ownership and possession of the real property, tangible personal property, intangible personal property that is titled to MOFMM, MARYLAND.

50. The real property, tangible personal property, and intangible personal property of MOFMM, MARYLAND should be distributed to MOFMM, USA to or for the benefit of MOFMM, INTERNATIONAL.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Enter a Declaratory Judgment that the real property known as 5503 Church Road and 5506 Church Road, and the tangible personal property and intangible personal property belonging to MOFMM, MARYLAND be and is the property of MOFMM, USA for the benefit of MOFMM, INTERNATIONAL;

B. Order the costs of this proceeding, and legal fees incurred by Plaintiffs to be paid by CHRIST THE TRUTH MINISTRIES; and

C. Grant such other relief as justice may require.

COUNT TWO
BREACH OF TRUST AND FIDUCIARY DUTY
AGAINST INDIVIDUAL DEFENDANTS LAWRENCE ADETUNJI, KAYODE
OJEWALE, CHRISTOPHER OKINDURO, ELERA NWOGU, EMILOLA OKE,
KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE,
RAYMOND AWOSIKA AND BEATRICE BOATENG

51. The allegations of Paragraphs 1 through 50 of this Complaint and Petition are incorporated as if restated herein.

52. The real property, tangible personal property, and intangible personal property titled in MOFMM, MARYLAND was held in trust by Trustees, the Defendants LAWRENCE ADETUNJI, KAYODE OJEWALE, CHRISTOPHER AKINDURO, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, AND BEATRICE BOATENG.

53. GBENGA ARONMOLATE of 5103 Glenn Dale Woods Court, Glenn Dale, Maryland is an interested person in that he is also a trustee.

54. The terms of the trust established in the corporate documents of MOFMM, MARYLAND provided that upon dissolution of the religious corporation all real property, tangible personal property, and intangible personal property shall be distributed to MOFMM, INTERNATIONAL by and through MOFMM, USA.

55. In violation of the trust provisions and in breach of their fiduciary duties, the individual Defendants named in this Court, have failed and refused to distribute the real property, tangible personal property, and intangible personal property to MOFMM, INTERNATIONAL and/or MOFMM, USA.

56. In violation of the trust provisions and in breach of their fiduciary duties, the individual Defendants named in this Court, have distributed the tangible personal property and intangible personal property instead to CHRIST THE TRUTH MINISTRIES, and have permitted CHRIST THE TRUTH MINISTRIES to make use of the real property.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Adjust, decree, and declare that Defendants LAWRENCE ADETUNJI, KAYODE OJEWALE, CHRISTOPHER AKINDURO, ELERA NWOGU, EMILOLA

OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, AND BEATRICE BOATENG have each violated the trust provisions and breached their fiduciary duties, for which each is personally liable and accountable.

B. Grant an accounting to Plaintiffs/Petitioners for the full amount of the assets of MOFMM, MARYLAND or its trustees, and the damages sustained by Plaintiffs/Petitioners.

C. Grant Plaintiffs/Petitioners judgment in excess of \$75,000 against each of the individual Defendants named in this Count, in such amount as may be shown by the accounting prayed herein.

D. Assume jurisdiction over the administration of the assets titled to MOFMM, MARYLAND or its trustees held in trust, and administer the same in accordance with the provisions of the trust.

E. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action for Breach of Trust and Fiduciary Duty.

F. Grant such other relief as justice may require.

COUNT THREE
PETITION FOR APPOINTMENT OF RECEIVER AGAINST
MOFMM, MARYLAND AND INDIVIDUAL DEFENDANTS
LAWRENCE ADETUNJI, KAYODE OJEWALE,
CHRISTOPHER AKINDURO, ELERA NWOGU, EMILOLA OKE,
KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE,
RAYMOND AWOSIKA AND BEATRICE BOATENG

57. The allegations of Paragraphs 1 through 56 of this Complaint and Petition are incorporated as if restated herein.

58. Good cause exists for this Court to assume jurisdiction and supervise the

liquidation of the assets titled to MOFMM, MARYLAND, or its trustees, pursuant to Maryland Code, Corporations & Associations Article §3-411.

59. The cause for Court supervision of the liquidation and distribution of the assets of the religious corporation are that the real property, tangible personal property, and intangible personal property titled to the religious corporation or to its trustees, have not been distributed pursuant to the terms of its corporate documents or the law.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Assume jurisdiction over the liquidation of MOFMM, MARYLAND, pursuant to Maryland Code, Corporations & Associations Article §3-411.

B. Appoint a Receiver for the accounting, liquidation and distribution of the assets of MOFMM, MARYLAND.

C. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

D. Grant such other relief as justice may require.

**COUNT FOUR
TROVER AND CONVERSION
AGAINST CHRIST THE TRUTH MINISTRIES AND INDIVIDUAL
DEFENDANTS LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO,
ISRAEL ADETUNJI, RONKE ADETUNJI AND ESTHER ADETUNJI**

60. The allegations of Paragraphs 1 through 59 of this Complaint and Petition are incorporated as if restated herein.

61. The taking of the tangible personal assets titled to MOFMM, MARYLAND, by CHRIST THE TRUST MINISTRIES and LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI was

intentional exercise of dominion and control over tangible personal property belonging to Plaintiffs/Petitioners, and without permission or justification.

62. Defendants CHRIST THE TRUTH MINISTRIES and LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI remain in possession and control of the tangible personal property belonging to Plaintiffs/Petitioners.

63. The value of the tangible personal property converted is in excess of \$75,000.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Grant them judgment against CHRIST THE TRUTH MINISTRIES and LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI in excess of \$75,000.

B. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

C. Grant such other relief as justice may require.

**COUNT FIVE
CIVIL CONSPIRACY
AGAINST INDIVIDUAL DEFENDANTS LAWRENCE ADETUNJI,
CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU,
EMILOLA OKE, KOFFI POSSIAN MIRIAM MORGAN, QUADRI ADELEKE
RAYMOND AWOSIKA, BEATRICE BOATENG ISRAEL ADETUNJI, RONKE
ADETUNJI AND ESTHER ADETUNJI**

64. The allegations of Paragraphs 1 through 63 of this Complaint and Petition are incorporated as if restated herein.

65. The individual Defendants LAWRENCE ADETUNJI, CHRISTOPHER

AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI agreed and acted in confederation for the purpose of depriving Plaintiffs/Petitioners of their interest in the real property, tangible personal property, and intangible personal property titled to MOFMM, MARYLAND.

66. As a result of the actions of these Defendants, acting in concert, the real property, tangible personal property, and intangible personal property that should be distributed to Plaintiffs/Petitioners has instead been distributed to, taken by, and/or made use of one or more organizations controlled by these Defendants or by some of them.

67. The actions of these Defendants, and each of them, were knowing, intentional, and malicious against the rights and interests of Plaintiffs/Petitioners.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Grant them judgment against Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI each in excess of \$75,000 compensatory damages.

B. Grant them judgment against Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and

ESTHER ADETUNJI for punitive damages in the amount of \$250,000 each.

C. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

D. Grant such other relief as justice may require.

**COUNT SIX
CONCEALMENT**

**AGAINST INDIVIDUAL DEFENDANTS LAWRENCE ADETUNJI,
CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU,
EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE,
RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE
ADETUNJI AND ESTHER ADETUNJI**

68. The allegations of Paragraphs 1 through 67 of this Complaint and Petition are incorporated as if restated herein.

69. The individual Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI, acting in concert, failed to advise MOUNTAIN OF FIRE MINISTRIES, INTERNATIONAL, MOFMM, USA or the congregation of MOFMM, MARYLAND of their actions detailed in this Complaint and Petition.

70. The individual Defendants had a duty as fiduciaries and by express agreement to disclose the actions detailed in this Complaint and Petition to MOFMM, INTERNATIONAL, MOFMM, USA and the congregation of MOFMM, MARYLAND.

71. The failure to make disclosure was done with the intent to deceive Plaintiffs/Petitioners.

72. Plaintiffs/Petitioners acted in justified reliance upon the concealment.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Grant them judgment against Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI each in excess of \$75,000 compensatory damages.

B. Grant them judgment against Defendants LAWRENCE ADETUNJI, CHRISTOPHER AKINDURO, KAYODE OJEWALE, ELERA NWOGU, EMILOLA OKE, KOFFI POSSIAN, MIRIAM MORGAN, QUADRI ADELEKE, RAYMOND AWOSIKA, BEATRICE BOATENG, ISRAEL ADETUNJI, RONKE ADETUNJI and ESTHER ADETUNJI for punitive damages in the amount of \$250,000 each.

C. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

D. Grant such other relief as justice may require.

COUNT SEVEN
FRAUD
AGAINST DEFENDANT LAWRENCE ADETUNJI

73. The allegations of Paragraphs 1 through 72 of this Complaint and Petition are incorporated as if restated herein.

74. The representations made by Defendant LAWRENCE ADETUNJI to Plaintiffs were false when made; and to the extent they were promises of future performance he had no intention of complying with when made.

75. Defendant LAWRENCE ADETUNJI knew that the representations were untrue when he made them to Plaintiffs/Petitioners.

76. Defendant LAWRENCE ADETUNJI made the representations for the purpose of defrauding Plaintiffs/Petitioners.

77. Plaintiffs/Petitioners relied with justification on the representations of Defendant LAWRENCE ADETUNJI.

78. Plaintiffs/Petitioners have sustained damage as a direct result of their reliance on the untrue allegations of Defendant LAWRENCE ADETUNJI.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Grant them judgment against Defendant LAWRENCE ADETUNJI, in excess of \$75,000 compensatory damages.

B. Grant them judgment against Defendant LAWRENCE ADETUNJI for punitive damage in the amount of \$250,000.

C. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

D. Grant such other relief as justice may require.

**COUNT EIGHT
EJECTMENT
AGAINST DEFENDANTS CHRIST THE TRUTH MINISTRIES
AND LAWRENCE ADETUNJI**

79. The allegations of Paragraphs 1 through 78 of this Complaint and Petition are incorporated as if restated herein.

80. CHRIST THE TRUTH MINISTRIES has wrongfully entered upon and is in possession of the real property known as 5503 Church Road and 5506 Church Road,

Bowie, Maryland.

81. Defendant LAWRENCE ADETUNJI has remained in possession of the real property known as 5503 Church Road and 5506 Church Road, Bowie, Maryland, without right to do so.

82. Plaintiffs/Petitioners are entitled to immediate possession of the properties at 5503 and 5506 Church Road, Bowie, Maryland.

83. As a result of the wrongful possession of CHRIST THE TRUTH MINISTRIES and LAWRENCE ADETUNJI, Plaintiffs/Petitioners have suffered economic loss, in the loss of use of the properties.

WHEREFORE, Plaintiffs/Petitioners pray that this Court:

A. Grant them judgment against Defendants CHRIST THE TRUTH MINISTRIES and LAWRENCE ADETUNJI, in excess of \$75,000 compensatory damages.

B. Grant Plaintiffs/Petitioners interest, costs, and attorney fees incurred in prosecuting this action.

C. Grant such other relief as justice may require.

Respectfully submitted,

FERGUSON, SCHEDELICH & BALLEW, P.A.

By:



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