

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

RODERICK CHAVEZ, *et al.*

:

Plaintiffs,

:

v.

:

CAL12-3774

JERICO BAPTIST CHURCH
MINISTRIES, INC., *et al.*

:

Defendants.

:

AFFIDAVIT

I, Roderick Chavez, hereby affirm that I am an adult over the age of 18 and have personal knowledge of the matters set forth below.

- 1) I am a member of the Jericho Baptist Church Ministries Inc. congregation located at 8501 Jericho City & Bishop Peebles Dr Landover, MD 20785.
- 2) I am a named Plaintiff in a current lawsuit against Jericho Baptist Church Ministries Inc ("Jericho") and the Board of Trustees.
- 3) I was a member of Jericho when this action was filed and have been a member since December 10, 2000.
- 4) The individuals claiming to be the elected Board of Trustees for the Jericho Baptist Church Ministries Inc. Gloria McGruder, Clifford Boswell, Denise Killen, Clarence Jackson, Dorothy Williams and Linda Pyles were never elected as Trustees.
- 5) These unelected Trustees claim their right as being told by the late Apostle Betty Peebles that she wanted to have them as Trustees.
- 6) Their claim to legitimacy is not based on having been elected or appointed.
- 7) These individuals are responsible for deceiving legitimate board members into signing documents that allegedly removed them from the board after serving for decades.
- 8) These individuals have amended the church bylaws to allow them to maintain the status quo and seize power illegitimately.
- 9) They have refused to release information that has been requested of them in accordance with Maryland regarding the review of records.

Pl's Exhibit
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10) I have donated in tithes and offerings since December 2000 over \$70,000 to the church.

11) These individuals claim that I have no right to review records which Maryland law states I have a right to review if requested.

12) I, with over 100 other individual members, did request records of the church for review in accordance with Maryland law.

13) These unelected trustees had bylaws dated December 15, 2012 which did not mention membership qualifications.

14) Membership qualifications as of December 15, 2012 were as they have been since the church's inception in the 1960's and as stated in the articles of incorporation dated December 15, 2010 and signed November 1, 2012 by the unelected trustees.

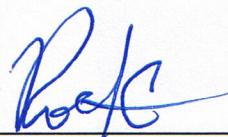
15) The articles of incorporation mentioned in paragraph 14 above allow membership to be open to all who accept Jesus Christ as Lord.

16) The unelected trustees have claimed all spiritual authority in their bylaws dated March 1, 2012.

17) These individuals now, after having been asked to produce records, have changed the requirements to be a church member to suit their personal needs and dictate not the needs of the church completely contradicting the entire church history, biblical standards and Christian requirements to be a church member.

18) These unelected trustees have changed the bylaws dated December 15, 2012 to the version now dated March 1, 2012 and state that although the state of Maryland allows members to vote for initial incorporators they contradict Maryland law, violate public policy and attempt to disenfranchise members by stating in these March 2012 bylaws that church membership does not confer state corporate voting.

I HEREBY AFFIRM under the penalties of perjury that the foregoing responses are true and based on personal knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Roderick Chavez