

Alexandria, VA 22305,
Individually and as a Board Member,

Clarence D. Jackson
2502 Fort Drive
Suitland, MD 20746,
Individually and as a Board Member,

Clifford Boswell
12310 Cedarbrook Lane
Laurel, MD 20708,
Individually and as a Board Member,

Lynda Pyles
2113 Gadsen Road
Upper Marlboro, MD 20774,
Individually and as a Board Member,

Defendants.

* * * * *
* * * * *

**COMPLAINT FOR WRIT OF MANDAMUS, DECLARATORY JUDGMENT,
EQUITABLE RELIEF, AND ENFORCEMENT OF STATUTORY RIGHTS**

COME NOW, Plaintiffs, Roderick Chavez ("Chavez"), Barbara Jackson ("Jackson"), Trenillo Walters ("Walters"), Charlease Logan ("Logan"), and Bessie Ashworth ("Ashworth"), by and through counsel, Raouf M. Abdullah and Raouf M. Abdullah & Associates, LLC, and bring this action pursuant to *Md. Rule 15-701* and § 3-406 of the *Md. Courts and Judicial Proceedings Code, Ann.*, and states the following:

Parties

1. That Plaintiffs, Chavez, Jackson, Walters and Logan are residents of the state of Maryland, Plaintiff, Ashworth, is a resident of Washington, DC.
2. That Defendant, Jericho Baptist Church of Praise, Inc. (hereinafter "Defendant" or "Jericho"), is a corporation

organized under title 5, subchapter 3, of Corporations and Associations Article of the Annotated Code of Maryland.

3. That the purported Board of Trustees of Jericho are Gloria McClam-Magruder, Clifford Boswell, Denise Killen, Dorothy Williams, Clarence Jackson, and Linda Pyles (collectively "Board").

Jurisdiction and Venue

3. That this Court has Jurisdiction over the subject matter pursuant to *Md. Rule 15-701*, § 6-102 of the *Md. Courts and Judicial Proceedings Code Ann.* and § 3-403 of the *Md. Courts and Judicial Proceedings Code Ann.*

4. That venue is proper in Prince George's County pursuant to § 6-201(a) of the *Md. Courts and Judicial Proceedings Code Ann.*, because Defendant regularly conducts business in Landover, Maryland, which lies in Prince Georges County, Maryland.

Facts

5. That at all times relevant herein Plaintiffs have been and continue to be members of Defendant, Jericho Baptist Church Ministries, Inc.

6. That on or about November 9, 2011, Plaintiffs, to include, but not limited to Roderick Chavez have made demands on Defendant to inspect all the record book of the organization and have been denied the opportunity to do so resulting in an infringement on their rights as members of said organization.

7. That on or about November 8, 2011, a written demand to inspect all the record book of said organization was made to the Board as a whole by over one hundred fifty (150) members of said organization, and to date Defendant has not allowed or permitted any disclosure, release, inspection, viewing, or inquisition of the record book.

8. That Defendant refuses to adhere to and following mandates set forth in the very Article that permits said organization to exist.

9. That pursuant to: § 5-307(a)(2) of the *Md. Corporations and Associations Code Ann.*, which states: “[t]he trustees shall [a]llow inspection of the record book by members of the religious corporation.” A further reading of this very same section mandates that: “[t]he trustees shall [a]llow the proceedings recorded in the record book to be presented before a public meeting, if required by five or more members of the religious corporation.” *Id.* § 5-307(a)(3).

Count I: Writ of Mandamus

10. Plaintiff hereby adopts and incorporates allegations one (1) through nine (9) as if fully set forth herein and asserts:

11. That Defendant has a clear duty and obligation under the aforementioned statute to provide members of said organization with access to all of the record book and have willfully abated its duty.

12. That Plaintiffs as members of said organization have an absolute right to inspect the record book.

13. That Plaintiffs have no other adequate remedy outside this Honorable Court exercising its equitable powers.

Count II: Declaratory Judgment

14. Plaintiff hereby adopts and incorporates allegations one (1) through nine (9) as if fully set forth herein and asserts:

15. That Plaintiffs have asserted their legal right to inspect the record book by making a demand to inspect.

16. That Defendants have implicitly denied that Plaintiffs have a legal right to inspect the record book by refusing to acknowledge receipt of the demand letter. Moreover, Defendants continue to this day to deny Plaintiffs their legal right as members of said organization to inspect the record book.

WHEREFORE, Plaintiffs respectfully pray:

A. That a Writ of Mandamus be issued by this Court ordering Defendant to allow inspection of all the organization's record book within ten (10);

B. That this Court find and declare that Defendant is under a legal obligation and duty to allow Plaintiffs to inspection of all the record book; and

C. Any other relief this Court deem just and proper.

Respectfully submitted,

Raouf M. Abdullah
Attorney for Plaintiffs

AFFIDAVIT

I HEREBY SOLEMNLY swear or affirm under the penalties of perjury that the contents of the foregoing Complaint are true to the best of my knowledge, information, and belief.



Roderick Chavez

Date