



People of Praise Maryland

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Members of the City of Praise,

The rogue unelected, self appointed board is retaliating against Pastor Joel and Chairman Meadows because members are not giving tithes and offerings to them. These people have asked the judge to find Pastor Joel and Elder Meadows in contempt of court. Pastor Joel and Elder Meadows have NOT touched any tithes or offerings belonging to Jericho. The hearing is scheduled for 4/16/2012 @ 9am in Upper Marlboro. Continue to fast and pray as we are fighting against spiritual wickedness in high places. This board has shown us that their only concern is money and nothing will stop them from getting it. They don't care about saving souls and will tear this ministry apart if they have to. They want the judge to place them as trustees over Joel Peebles Ministries and any rights that he may have or be entitled to in the future. They want Pastor Joel to turn over all donations given to his ministry and well as his financial records. They did not turn over financial records when the judge ordered them to do so and have yet to honor the repeated requests from the congregation to show us their financial records. It's unimaginable that they would treat the congregation and Apostle Betty's only living son this way. ***1 Timothy 6:5-10 "Perverse disputings of men of corrupt minds, and destitute of the truth, supposing that gain is godliness: from such withdraw thyself.... But they that will be rich fall into temptation and a snare and into many foolish and hurtful lusts, which drown men in destruction and perdition. For the love of money is the root of all evil: which while some coveted after, they have erred from the faith, and pierced themselves through with many sorrows."***

WHEREFORE, for the foregoing reasons Plaintiff Board of Trustees of the Jericho Baptist Church Ministries, Inc. respectfully requests that this Honorable Court grant the following relief:

- a. grant Plaintiff's Petition for Order of Contempt against Defendants Joel R. Peebles, Sr. and William A. Meadows and hold Defendants in contempt of its October 24, 2011 Order;
- b. order that Defendants Joel R. Peebles, Sr. and William Meadows, under oath, account for and turn over to Plaintiff all monies collected by Defendant Peebles at or through the Church for any purpose, within five (5) days from the date of the Court's order;

c. order that Defendants Joel R. Peebles, Sr. and William Meadows, under oath, turn over to Plaintiff all bank statements and records for said monies collected by Defendants at or through the Church for any purpose, or paid from said monies, within five (5) days from the date of the Court's order;

d. order that Defendant Joel R. Peebles, Sr. immediately cease and desist operating Joel Peebles Ministries and discontinue the website for www.joelpeeblesministries.com;

e. order that Defendant Joel R. Peebles, Sr., under oath, account for and turn over to Plaintiff all monies collected by Defendant Peebles at or through Joel Peebles Ministries for any purpose, within five (5) days from the date of the Court's order;

f. order that Defendant Joel R. Peebles, Sr., under oath, account for and turn over to Plaintiff all bank and financial statements and records regarding monies collected or paid by Joel Peebles Ministries for any purpose, within five (5) days from the date of the Court's order;

g. order that Defendant Joel R. Peebles, Sr., under oath, disclose the name and address of all individuals to whom or entities to which he has paid monies as of or after the October 25, 2011 entry date of the Court's order, and the amounts paid to each individual or entity for any purpose, within five (5) days from the date of the Court's order;

h. grant Plaintiff a constructive trust over all assets, accounts and any rights Defendant Peebles may have or be entitled regarding Joel Peebles Ministries, LLC;

i. order that such further relief be granted with regard to Defendants as deemed appropriate following a hearing on Plaintiffs' Petition for Order of Contempt;

j. award to Plaintiff the costs of these proceedings, including reasonable legal fees and costs; and

k. award such other and further relief as this Honorable Court may determine to be just and proper.