

29. That thereafter, the Lieutenant ordered "his officer" to leave the building and not return until Deacon Jackson could produce a sheet of paper requiring the police officer to take action.

30. That on October 4, 2012, the Plaintiffs were informed by their bank, that their account(s) had been frozen. Moreover, when the Plaintiffs inquired as to why the accounts had been frozen, the Plaintiffs were provide a copy of a letter from the Defendants' counsel alleging that his clients are the valid Board of Trustees for Jericho Baptist Church Ministries, Inc. and threatening "to take legal action to hold the Bank and individual officers of the Bank liable for" any unlawful transactions. (See ex. 5)

31. That as a result of the Defendants continued interference with the day-to-day administration of church business on October 5, 2012, the Plaintiffs filed an Emergency Motion to Restore and Modify the Lower Court's Temporary Restraining Order or in the Alternative for Injunctive Relief in the Court of Special Appeals. (See ex. 6)

32. That with full knowledge of the pending Motion in the Court of Special Appeals, on Wednesday, October 10, 2012, Defendant Peebles interrupted the morning chapel service for the Academy children. Defendant Peebles intimidated parents, teachers and staff by telling them that he would be back soon and inferring that there would be consequences for those individuals that did not follow him when he was terminated.

33. That on that same Wednesday evening, Defendant Peebles also had his cronies (Keith Moore, Rod Chavez, Raymond Morse and Mark Robinson) stationed

immediately outside of the door where Bible Study was being conducted terrorizing the church members. Specifically, Defendant Peebles' cronies were hovering in a dark parking lot approaching women as they entered or exited the chapel for Bible Study. Moreover, they also "got in the face of members and attempted to take pictures of them entering and exiting the chapel.

34. That on Saturday, October 13, 2012, with full knowledge that there was no security detail on the premises, Defendant Peebles and Raymond Morse interrupted the Women of Power Meeting being held at the Chapel. Defendant Peebles and Mr. Morse entered the ladies room, physically assaulted church members and refused to leave the chapel. Furthermore, once Defendant Peebles finally left the chapel, the Women of Power were so afraid, that they locked the door and called the Prince George's County police. However, once Defendant Peebles saw the police approaching, he left the property. (See ex. 7-12)

35. That on October 15, 2012, the Court of Special Appeals entered and Order denying Plaintiffs' Emergency Motion for to Restore and Modify the Lower Court's Temporary Restraining Order or in the Alternative for Injunctive Relief. Specifically, the Court of Special Appeals determined that it did not have jurisdiction. (See ex. 13)

36. That all of the Defendants actions since the Court of Special Appeals filed its unreported opinion were meant to seriously impede the orderly operation of Jericho Baptist Church Ministries, Inc. and also have created serious public safety and financial problems.