

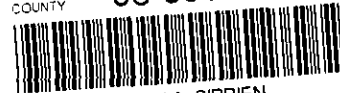
STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

THE MUSLIM CENTER OF
BLOOMFIELD HILLS, INC.,
a Domestic Non-Profit Organization

Plaintiff,

OAKLAND
COUNTY

08-095440-CZ



JUDGE COLLEEN A. O'BRIEN
MUSLIM CENTER v KASSAB, MAYSO

-vs.-

Case No.
Hon.

CZ

MAYSOON KASSAB, an Individual,
UM AHMAD, an Individual,
MOHAMMAD KASSEM, an Individual,
and MOHAMED ALI, an Individual
Joint and Severally

Defendants,

Akeel & Valentine, PLC
Shereef H. Akeel (P54345)
Muneeb M. Ahmad (P70391)
Attorney for Plaintiffs
888 W. Big Beaver Road
Ste. 910
Troy, MI 48084
Telephone: (248) 269-9595

COMPLAINT

JURISDICTIONAL ALLEGATIONS

1. Plaintiff, The Muslim Center of Bloomfield Hills, Inc. d/b/a Unity Center, Board of Trustees (hereinafter referred to as "Unity"), is a resident of Oakland County, Michigan.
2. Upon information and belief, Defendant, Maysoon Kassab, is a resident of Oakland County, Michigan.

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3. Upon information and belief, Defendant, Um Ahmad, is a resident of Oakland County, Michigan.

4. Upon information and belief, Defendant, Mohamed Ali, is a resident of Oakland County, Michigan.

5. Upon information and belief, Defendant, Mohammad Kassem, is a resident of Oakland County, Michigan.

6. The incident complained of occurred in Oakland County, Michigan.

7. The amount in controversy exceeds Twenty Five Thousand (\$25,000) Dollars, exclusive of interest and costs.

FACTUAL ALLEGATIONS

8. Plaintiff repeats and re-alleges the foregoing paragraphs, as though fully set forth in Paragraphs 1-6.

9. Plaintiff is a non-profit religious organization that works closely with the City of Bloomfield Hills and Oakland County, in providing community services and interfaith outreach programs to educate the public about the religion of Islam;

10. Plaintiff has a governing body known as the Board of Trustees ("Board").

11. Plaintiff has served as a stellar organization for the community at large

12. Upon information and belief, Defendant Kassab, Defendant Ahmad, Defendant Kassem, and Defendant Ali (hereinafter collectively referred to as "Defendants"), at all time acted in concert with each other, and/ or in furtherance of a common goal, to defame and disparage Plaintiff and certain members of its Board.

13. Upon information and belief, Defendants, individually or collectively, own, used,

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created, and/ or operated various email addresses, including but not limited to:

- a. maysoon.kassab@gmail.com;
- b. tunowa@gmail.com;
- c. ali.sunshine.mohamed@gmail.com;
- d. fundraising.committe@gmail.com;
- e. amicomforever@gmail.com;
- f. dexapeptide@gmail.com;
- g. jailforterrorists@gmail.com;
- h. Unitygate@gmail.com
- i. mixmaster@remailer.privacy.at;
- j. anonymous.b5850fed33@anonymousspeech.com;
- k. anonymous.3060bc9b29e@anonymousspeech.com;
- l. anonymous.72fb2ac698@anonymousspeech.com;
- m. anonymous.3ba3121720@anonymousspeech.com;
- n. anonymous.5957c5dcaa@anonymousspeech.com; and
- o. anonymous.1080525b8c@anonymousspeech.com;

14. Upon information and belief, on February 29, 2008, among the defamatory statements made by Defendants, Defendants posted an online petition implying that Plaintiff Unity is supporting and promoting religious beliefs contrary to the interests of its congregation, and sent another email message to Unity Board members encouraging them to sign the petition.

15. Upon information and belief, on June 16, 2008, and June 24, 2008, Defendants admitted to making defamatory statements by sending email messages to the Plaintiff Unity advising that it had published information about Plaintiff on the internet in which Defendants alleged Plaintiff was allegedly promoting religious beliefs contradicting the interests of its congregation, that Plaintiff Unity is no long an Islamic Center, and urging Muslims to distance themselves from Plaintiff due to its alleged political, tribal, and alleged sectarian behavior.

16. Defendants have engaged in all efforts to mask or conceal their identities so that they would not be held responsible or accountable for their defamatory statements

17. As a result of Defendants' conduct and defamatory statements, Plaintiff Unity

reputation and standing in the community was diminished.

COUNT I - DEFAMATION

18. Plaintiff repeats and re-alleges the foregoing paragraphs, as though fully set forth in Paragraphs 1-17.

19. The accusations contained in the emails that Defendants sent to Plaintiff Unity and that were published on the internet, as outlined above in paragraphs 14-15, are false.

20. Defendants published the remarks to third parties with knowledge of the falsity of the statements or in reckless disregard of their truth or falsity.

21. The publication was not privileged.

22. The publication of these remarks has resulted in damage to Plaintiff Unity's, *reputation in the community and has caused economic loss. These damages include but are not limited to:*

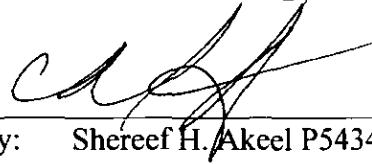
- a. economic loss in the form of diminished charitable contributions;
- b. humiliation, mortification, and embarrassment; and
- c. *other damages that may arise during the course of discovery and the course of this trial.*

23. Defendant's accusations were defamation per se.

WHEREFORE, Plaintiff Unity respectfully requests this Honorable Court to enter judgment in its favor against Defendants in whatever amount Plaintiff is found to be entitled, together with costs and interest.

Respectfully Submitted,

AKEEL & VALENTINE, PLC

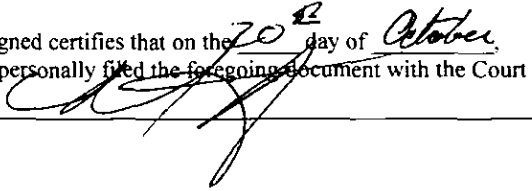


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Facsimile: (248) 269-9119

DATED: October 20, 2008

PROOF OF SERVICE

The undersigned certifies that on the 20th day of October,
2008, (s)he personally filed the foregoing document with the Court



Plaintiff's Complaint 102008.wpd

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