

IKE AGWUEGBO & CO P.C.

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VSE Olaitan Balogun,
Rehoboth Parish,
125-7 East 107th Street,
Chicago, Illinois, 60628
09/06/2022

Dear Mr. Balogun,

This firm represents the Celestial Church of Christ, USA Diocese, hereinafter referred to as "The USA Diocese".

It has come to our attention that you have been parading yourself as the Head of Diocese, Celestial Church of Christ USA Diocese. To be clear, Celestial Church of Christ, USA Diocese has been registered by this firm in most states where the Church has parishes in order to protect the assets and interests of the diocese in accordance with each state law from abuse, violation and possible infringement. Celestial Church of Christ, USA Diocese remains one, focused and strong under the leadership of the Head of Diocese - VSE Joseph Olorunnisola.

The administration of the Not for Profit Organization, Celestial Church of Christ, U.S.A Diocese, is governed by the Organization's Articles of Association, Byelaws and Constitution which do not provide for an alternate or two Heads of Diocese.

You have also engaged in the infringement of the tradename “Celestial Church of Christ, USA Diocese” Unfair Competition under the Trademark Act of 1946, (The Lanham Act) and for Deceptive Trade Practices, Tortious Interference with Contractual and Prospective Business Relations, and violation of the Delaware Deceptive Trade Practices Act.

We are further informed that you have indeed registered a Not for Profit Corporation “Celestial Church of Christ, National Diocese” thereby attempting to pass off your Corporation as the Celestial Church of Christ. USA Diocese.

We note that you have claimed to have been appointed by Rev. EMF Oshoffa, to assume this role. However, not only does he not have the powers to so appoint you or in fact anyone else to any position in the Celestial Church of Christ USA Diocese, we are aware that Rev. EMF Oshoffa has since been estopped from continuing to act in the capacity of the Pastor of the Church by several courts in Nigeria. See the Registered Trustees of Celestial Church of Christ (Nigeria Diocese) v. Mr. Godwin Bolanle Shonekan and The Registered Trustees of Celestial Church of Christ (Nigeria Diocese), Emmanuel Mobiyina Oshoffa Suit No. HCL/07/2006 (High Court of Ogun State, holden at Ilaro), Most Sup. Evang. Samson Olatunde Banjo & 3 Ors v. Rev. Emmanuel Mobiyina Oshoffa & 2 Ors Suit No. FHC/L/CS/565/2021.

Moreover, no one asides from the trustees of the Celestial Church of Christ USA Diocese can appoint or remove any members of the Diocesan Board.

The USA Diocese demands that you cease and desist all unlawful conduct immediately, including but not limited to:

1. Stop doing parading yourself as the HOD, USA Diocese.
2. Stop communicating with and soliciting the USA Diocese's current Shepherds and Parishioners.
3. Stop using stationery with the USA Diocesan name.
4. Stop inhibiting the US Diocese from conducting its business by spreading false information about the Diocese and its HOD, VSE Joseph Olorunnisola.
5. Refrain from any defaming or slandering the USA Diocese, its Shepherds and Parishioners, in any manner whatsoever.

If you do not comply, the USA Diocese will without further recourse to you, commence legal action against you and any of your proxies. The USA Diocese reserves all legal and equitable rights under the Lanham Act, the Delaware Deceptive Trade Practices Act and other applicable laws.

Sincerely Yours,
Ike Agwuegbo
/s/ Ike Agwuegbo Esq