

Court File No.

CV-17-573595

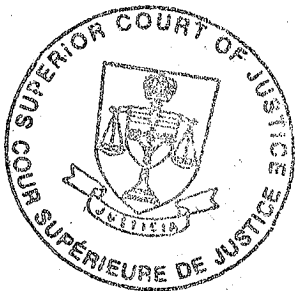
ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

STEPHANIE OTOBO

Plaintiff



- and -

APOSTLE JOHNSON SULEMAN

Defendants

STATEMENT OF CLAIM

TO THE DEFENDANT(S):

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or any Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiff's lawyer or, where the Plaintiff does not have a lawyer, serve it on the Plaintiff, and file it, with proof of service in this court, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH

TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM and \$12,000.00 for costs, within the time for serving and filing your statement of defence, you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the Plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date

April 19/2017

Issued by:

Healy Miller

Local Registrar

Address of Court Office:
393 University Avenue, 10th Floor
Toronto, Ontario
M5G 1E6

To Defendant:

APOSTLE JOHNSON SULEMAN
13 – 2009 Lawrence Ave West
Toronto, Ontario M9N 3V2

1. The Plaintiff claims:

- a. damages for breach of trust, breach of fiduciary relation, breach of contract, negligence, defamation, poisoning, intentional and negligent infliction of emotional distress, forcible confinement, multiple instances of battery, false imprisonment, fraud, assaults, sexual assaults, sexual harassments, harassments, and malicious prosecution in the amount of \$5 000,000.00 (Five Million Dollars CAD).
- b. prejudgment and post judgment interest pursuant to sections 128 and 129 of the Courts of Justice Act, R.S.O. 1990, C. 43., and any other applicable sections of Ontarian legislation;
- c. her legal costs and disbursements, plus applicable HST in accordance with the Excise Tax Act, R.S.C. 1985, c. E-15, as amended;
- d. An Order restraining Apostle Suleman from contacting and communicating, directly or indirectly, with Stephanie, and, while in Canada refraining from being at a distance of at least 500 metres from Stephanie; and
- e. such further and other relief as this Honourable Court may deem just;

PARTIES

2. Plaintiff, Ms. Stephanie Otobo ("Stephanie") was at all material times a Nigerian citizen and Canadian permanent resident, who came to Canada as a minour child, and has been a resident of this country ever since. Stephanie is an artist and a performer who trades her business in Europe and America and resides in Canada;
3. Defendant, Apostle Johnson Suleman ("Apostle Suleman") was at all material times an Investor in Canadian properties and businesses, a Religious Minister, Counsellor, and Spiritual Leader of the Omega Fire Ministry with worship centres in Canada and Nigeria, among other countries;

FACTS

4. Upon information and belief, in or about June 2015, Apostle Suleman started to groom Stephanie under the false pretence that he would provide trusted Spiritual Mentorship and Counselling to Stephanie, in order to begin a sexual and emotional relationship with her;
5. Stephanie was a refugee at the time, a vulnerable minour, with no guardian to protect and assist her in Canada;
6. Specifically, Apostle Suleman, was presented to Stephanie as a Spiritual Leader who would offer to provide Spiritual Counselling as well as Life Mentorship and guardianship for Stephanie. Apostle Suleman became a Guardian and Trustee to Stephanie;

7. Around the said time, Apostle Suleman informed Stephanie that he had divorced his wife;
8. As part of the grooming, Apostle Suleman invited Stephanie from Canada to Italy and other European countries;
9. In Europe, Apostle Suleman, engaged in psychological programming sessions of Stephanie in order to eventually have his way with her sexually. Part of the grooming by Apostle Suleman was to convince her that he would be unable to serve the Lord without being able to corporally possess Stephanie. He informed that Stephanie inspired Apostle Suleman to write sermons and songs for his church programs;
10. On or about the summer of 2015, Apostle Suleman invited Stephanie to his church in Nigeria;
11. At the said time Apostle Suleman asked Stephanie to get pregnant from him as he wanted to have more male children. He explained to Stephanie that a progeny by the two of them would have spiritual powers that would benefit human kind;
12. On or about August 2015, Stephanie became pregnant with Apostle Suleman's child. At or around that time Apostle Suleman formally proposed marriage to Stephanie which she accepted;
13. In furtherance to the said marriage proposal, Apostle Suleman went to Stephanie's family with gifts for an introduction. On the introduction, in which Stephanie's mother sister, uncle, cousins and other family members were in attendance, Apostle Suleman informed them of his undertaking to marry Stephanie;
14. At around the said time, Apostle Suleman compelled Stephanie to forfeit her house, lucrative career, cars, friends and other things in Canada as he undertook to protect her in Nigeria and buy for her a house in Nigeria in order to make her life comparably comfortable to her Canadian life style.
15. Stephanie relied on Apostle Suleman's undertaking;
16. On or about October of 2015, Apostle Suleman breached the undertaking to marry Stephanie;

17. On or about August 25th, 2015, Stephanie arrived in Nigeria and met Apostle Suleman at the Definite Destiny Hotel, beside the Airport Hotel, Ikeja, Lagos State.
18. At the hotel, Apostle Suleman gave Stephanie a drink and informed her that the drink was a concoction for her spiritual fortification, which she drank.
19. Throughout his time with Stephanie, Apostle Suleman used his office of Minister to manipulate, groom and psychologically condition Stephanie into obeying him and his whims no matter how ridiculous these whims would be perceived to western eyes.
20. Apostle Suleman's Ministry is very powerful and worldwide with churches, chapters and congregants in Europe, Africa, and North America. He is followed by approximately 100 thousand people worldwide.
21. Within 10 minutes Stephanie drinking the concoction, she started vomiting blood and passed out because of the blood loss.
22. Eventually, after she regained consciousness, Apostle Suleman then gave Stephanie pills to stop the bleeding, though the blood did not stop immediately but the pain subsided and her pregnancy was aborted.
23. Stephanie was devastated by the development and could not come to terms with the facts that her Spiritual Leader, a man that claimed to love her and undertook to marry her could procure abortion for her without her consent in a procedure that could have lead to her death.
24. As a result of this tragic experience, Stephanie began to make efforts to start to dissociate herself from the false prophet Apostle Suleman.
25. The reach of Apostle Suleman is cross continental and reaches Canada. A campaign of fear, harassment and retaliation began with a goal of coaxing and forcing Stephanie to return to the wanting Minister.
26. Apostle Suleman was the main driver of this campaign, but also delegated the task of stalking, following, and forcing Stephanie to remain in his orbit to many of his congregants who reside in the Toronto area.
27. Stephanie was fearful for both herself and her family in Nigeria to completely break away from Apostle Suleman's reach, but as a young lady, with an imbalance in the power

dynamic and relationship, tried her best to keep her distances and stay away from Apostle Suleman.

28. After her forced abortion, any and all physical or verbal contact by Stephanie with Apostle Suleman was because she was psychologically forced to have contact with him, and not consensual, and because of specific threats made to her by either Apostle Suleman himself or delegate congregants of his Ministry.
29. Throughout the relationship with Stephanie, both before the forced abortion and after the forced abortion, on repeated occasions, Apostle Suleman forced himself sexually on Stephanie under the pretence that his conduct was allowed and suggested by the Almighty. Apostle Suleman would routinely, sexually force himself on Stephanie. Stephanie remains traumatized.
30. The threats, coaxing and manipulation eventually forced Stephanie back to Nigeria in the early winter of 2017.
31. At the time, Stephanie was in Nigeria with a male friend and business associate, acting as Protector.
32. Upon realizing that Stephanie was accompanied by a much younger male, Apostle Suleman became enraged as he feared that his grasp and control over Stephanie could wane.
33. On or about March 3rd, 2017, Stephanie was arrested by officers of the Nigeria Police Service from the Monitoring Unit, Kem Salem House Obalende, Lagos State at the behest of Apostle Suleman upon a baseless allegation of fraud.
34. Stephanie and her male friend were both arrested and handcuffed in public, inside a banking hall in the full glare of onlookers and spectators which caused her substantial embarrassment and emotional distress.
35. Both Stephanie and her male companion were beaten, and detained by the Nigerian Authorities where they continued to face mistreatments.
36. Subsequent to arrest, Stephanie and her male companion were detained at different detention centers.

37. It was always made clear to both Stephanie and her male companion that their afflictions, torture and mistreatments at the hands of the Nigerian authorities was as a direct consequence of having incurred the anger of Apostle Suleman. Many of the State authorities inflicting harm on Stephanie and her male companion were religious disciples of Apostle Suleman.
38. Both Stephanie and her male companion were prevented from appearing in Court in a timely fashion, even in accordance with Nigeria's own laws.
39. Their conditions in captivity led to Stephanie and her male companion, being assaulted, violated and tortured in custody by Nigerian authorities at the behest of Apostle Suleman;
40. Stephanie and her male companion eventually appeared in Nigerian Court, and were released;
41. Their matters are pending in Nigeria;
42. As against Apostle Suleman, Stephanie claims damages for breach of trust, breach of fiduciary relation, breach of sexual assault, and assault as well as sexual harassment, forcible confinement for grooming her, manipulating her and forcing her to enter and maintain a manipulated, forced and non consensual relationship;
43. As against Apostle Suleman, Stephanie claims damages for breach of his undertaking to marry her including terms such as failure to buy her a house, cars and other property in Canada and Nigeria;
44. As against Apostle Suleman, Stephanie claims damages for false arrest, false imprisonment, assault and battery, and maliciously employing Nigerian Police forces on baseless allegations of fraud to harass and prosecute her in Nigeria.
45. As against Apostle Suleman, Stephanie claims damages associated with slander and defamation of her character by means of propagating false information and lies about her

to Nigerian Authorities and the Nigerian public. As a result of defamatory statements, Stephanie's reputation in her community in Canada and Nigeria suffered and continues to suffer.

46. As against Apostle Suleman, Stephanie claims damages for compelling her to drink a substance that induced abortion and other physical and emotional damages.
47. As against Apostle Suleman, Stephanie claims damages for stalking, and harassing her, as well as threatening death and bodily harm.
48. As against Apostle Suleman, Stephanie claims damages for negligent infliction of emotional distress and of defamatory material, for maliciously employing Nigerian Police forces on baseless allegations of fraud to harass and prosecute her in Nigeria.
49. As against Apostle Suleman, Stephanie claims damages for intentional infliction of emotional distress and publication of defamatory material, and for maliciously employing Nigerian Police forces on baseless allegations of fraud to harass and prosecute her in Nigeria.
50. As against Apostle Suleman, Stephanie claims that he maliciously employed Nigerian Police forces on baseless allegations of fraud to harass and prosecute her in Nigeria, and that he sent her harassing emails, text messages and harassed her by other means of digital or conventional communications.

The Plaintiffs propose that this action be tried at the City of Toronto.

DATED THIS 19TH DAY OF APRIL, 2017.

EME Professional Corporation
5050 Dufferin Street, Suite 123
Toronto, Ontario M3H 5T5

Joel Etienne
Barrister & Solicitor
LSUC # 43254S

Tel: (416) 800-1783
Fax: 1-866-831-1372

Solicitor for the Plaintiffs

TO:

APOSTLE JOHNSON SULEMAN
13 – 2009 Lawrence Ave West
Toronto, Ontario
M9N 3V2

STEPHANIE OTOBO
Plaintiffs

-and-

APOSTLE JOHNSON SULEMAN
Defendants

COURT FILE NO. CV-17-573595

ONTARIO

SUPERIOR COURT OF JUSTICE

Proceeding Commenced at TORONTO

STATEMENT OF CLAIM

EME Professional Corporation
5050 Dufferin Street, Suite 123
Toronto, Ontario M3H 5T5

Joel Etienne
Barrister & Solicitor
LSUC # 43254S

Tel: (416) 800-1783
Fax: 1-866-831-1372

Solicitor for the Plaintiffs