

IN THE COURT OF COMMON PLEAS

FRANKLIN COUNTY, OHIO

Federation of Lofa Associations in the Americas, Inc,
National Board of Directors
Through and by its National Chairman
Stephen Y Jensen
Plaintiff,

v.

Patrick Flomo
James Koian
Phebe Koha,
Lanfia Warity
Sianeh Kpanaku
Asumana Pelima
David Kudel
Vankamoh L. Sherif
Rufus Kpadeh

Defendants.

Case No: _____

Judge: _____

VERIFIED COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

I. PARTIES

1. Plaintiff, The Federation of Lofa Associations in the Americas, is a nonprofit organization duly organized and existing under the laws of Ohio, with its principal office located at 6545 Market Ave North, Ste 100, Canton, Ohio 44721, and operating nationally including within the State of Ohio.
2. Defendant Patrick Flomo et al, an individual/organization with a business address at 2958 Stone Bluff 2H, Columbus, OH 43232 who is believed to reside or operate in the State of Ohio and within the jurisdiction of this Court.

II. JURISDICTION AND VENUE

3. This Court has jurisdiction under R.C. § 2305.01 and Ohio Civ. R. 65.
4. Venue is proper in Franklin County under R.C. § 2307.36 because the acts giving rise to this action occurred in this county.

III. FACTUAL ALLEGATIONS

5. Plaintiff has been continuously operating under the name Federation of Lofa Associations in the Americas for over 34 years and has developed significant goodwill and public recognition.
6. Plaintiff organizes sanctioned events, conferences, and National conventions for its members and the public under its registered and or common law trademarks.
7. Defendants have announced and are promoting a convention to be held on June 20–23, 2025, in Columbus, Ohio, using the name and branding of Plaintiff without any authorization or affiliation.
8. Defendants have advertised the event as if endorsed or organized by Plaintiff, causing confusion among members, sponsors, and the general public.
9. Plaintiff has not granted Defendants permission to use its name, logo, or identity in any form.
10. Defendant's actions constitute unauthorized use of a trade name, deceptive trade practices, unfair competition, and trademark infringement.

IV. CAUSES OF ACTION

COUNT I – TRADEMARK INFRINGEMENT

11. Plaintiff realleges and incorporates all preceding paragraphs.
12. Defendant's unauthorized use of Plaintiff's name constitutes trademark infringement under Ohio common law and R.C. 4165.02(A)(2).

COUNT II – DECEPTIVE TRADE PRACTICES (R.C. 4165.01 et seq.)

13. Defendant's use of Plaintiff's name misrepresents sponsorship or affiliation in violation of R.C. 4165.02(A)(2), (3), and (10).

COUNT III – UNFAIR COMPETITION

14. Defendant's misleading use of Plaintiff's identity is likely to deceive the public and diverts business from Plaintiff in violation of Ohio common law.

COUNT IV – INJUNCTIVE RELIEF (Ohio Civ. R. 65)

15. Plaintiff seeks a temporary restraining order and preliminary injunction to prevent further use of its name and brand in connection with the unauthorized event.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Issue a Temporary Restraining Order and Preliminary Injunction;
2. Permanently enjoin Defendant from using Plaintiff's name or likeness;
3. Award compensatory and punitive damages;
4. Award Plaintiff costs and attorney's fees;
5. Grant such further relief as justice requires.

VERIFICATION

I, Stephen Jensen, being duly sworn, state that I am the National Chairman of the Board acting on behalf of Plaintiff, Federation of Lofa Associations in the Americas, Inc National Board of Directors, that I have read the foregoing Complaint and that the facts stated therein are true to the best of my knowledge and belief.

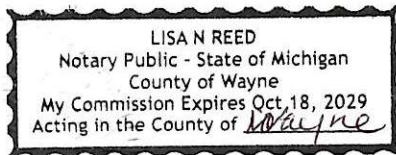
Signature: _____

Stephen Jensen

Name: Stephen Jensen

Title: Chairman, National Board of Directors of the Federation of Lofa Associations in the Americas

Sworn to and subscribed before me this 12th day of June, 2025.



Lisa N Reed

Notary Public Signature & Seal

Federation of Lofa Associations in the Americas (FLAA) Plaintiff,
Stephen Jensen, National Chairman
National Board of Directors, FLAA
v. Defendants.
Patrick Flomo
James Koiyan
Phebe Koha,
Lanfia Warity
Sianeh Kpanaku
Asumana Pelima
David Kudel
Vankamoh L. Sherif
Rufus Kpadeh

Judge:

I. INTRODUCTION

Following incorporation, the association adopted revised bylaws that implemented a dual leadership structure to ensure accountability through a system of checks and balances between the National Board of Directors and the National Convention. Executive officers were designated to serve two-year terms, reinforcing transparent and democratic governance.

In 2019, the COVID-19 pandemic disrupted all aspects of daily life, including governmental and civic operations. Our annual national convention—a foundational

event for association unity and governance—was no exception. In response to public health concerns and consistent with the bylaws, the National Board of Directors, under my leadership, voted to suspend the 2020 convention and extended the term of then-President James Koiyan of Pennsylvania by one year.

As the pandemic continued beyond that period, the Board formally requested that President Koiyan convene a virtual convention to ensure continuity of leadership. He declined to act on these requests, resulting in a prolonged absence of a legitimate electoral process and placing the association's governance framework in disarray.

Recognizing the threat to institutional stability, the Board acted in accordance with its authority and replaced Mr. Koiyan—whose term had expired—with an Interim Administration. Hon. Christopher Konneh of New Jersey was appointed Interim President, and this leadership transition was duly filed with the Ohio Secretary of State.

Despite the Board's formal cease-and-desist notice, Mr. Koiyan and his collaborators defied this lawful directive. He unilaterally misused association resources and bank accounts to host an unauthorized convention in Minneapolis, Minnesota. Now, in 2025, he and other individuals—listed in our filings—are again attempting to host an illegitimate national convention in Columbus, Ohio, in direct violation of the association's bylaws and governance structure.

These actions are unauthorized and threaten the legal integrity and unity of our association.

Plaintiff respectfully submits this Memorandum in Support of its Motion for a Temporary Restraining Order and Preliminary Injunction to enjoin Defendant(s) from conducting the unauthorized event titled "Federation of Lofa Associations in the Americas aka FLAA convention" scheduled to take place in Columbus, Ohio, Franklin County from June 20 to June 22, 2025. The event, if permitted to proceed, will cause immediate and irreparable harm to the Plaintiff's reputation, organizational interests, and legal rights.

II. LEGAL STANDARD

In Ohio, a court may grant injunctive relief when the moving party demonstrates:

1. A substantial likelihood of success on the merits;
2. Irreparable harm if the injunction is not granted;
3. That third parties will not be unjustifiably harmed;
4. That the public interest will be served.

See *Procter & Gamble Co. v. Stoneham*, 140 Ohio App. 3d 260, 267 (1st Dist. 2000); also *Frisch's Rests., Inc. v. Shoney's, Inc.*, 759 F.2d 1261, 1263 (6th Cir. 1985).

III. ARGUMENT

A. Plaintiff Is Likely to Succeed on the Merits

The unauthorized event is being promoted under the name and branding of Plaintiff's

association without permission. Ohio courts have recognized unauthorized use of organizational marks and misrepresentation of authority as actionable.

B. Plaintiff Will Suffer Irreparable Harm

If the injunction is not granted, Plaintiff will suffer reputational damage and loss of member trust. Monetary damages are insufficient to remedy this harm.

C. No Harm to Defendant Outweighs Harm to Plaintiff

Defendants will not be harmed by an injunction as they have no legal right to host the event under Plaintiff's identity.

D. The Public Interest Favors Injunctive Relief

Injunctive relief prevents public confusion and maintains lawful organizational governance.

IV. CONCLUSION

Plaintiff respectfully requests that this Court:

- Grant a Temporary Restraining Order enjoining Defendant(s) from organizing or proceeding with the event;
- Set a hearing on the request for Preliminary Injunction;
- And grant such other relief as the Court deems just and proper.

Respectfully submitted,

/s/Stephen Jensen

Stephen Jensen, Pro Se

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Federation of Lofa Associations in the Americas,(FLAA)
National Board of Directors, FLAA
Stephen Jensen, National Chairman

Plaintiff,

v.
Patrick Flomo
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Rufus Kpadeh

Defendant.

Case No.:

Judge:

AFFIDAVIT IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

STATE OF OHIO)

) SS:

COUNTY OF FRANKLIN)

I, Stephen Jensen, being duly sworn, depose and say:

1. I am over the age of 18 and competent to testify to the matters set forth herein.
2. I am the Chairman of the National Board of Directors of The Federation of Lofa Associations in the Americas, the Plaintiff in the above-captioned matter.
3. The facts set forth in the accompanying Memorandum in Support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction are true and accurate to the best of my knowledge.
4. The event scheduled for June 20–22, 2025, in Columbus, Ohio, is unauthorized and is being organized without the consent or authority of Plaintiff.

5. If the event is allowed to proceed, it will cause irreparable harm to Plaintiff's organizational interests, public credibility, and governance.

FURTHER AFFIANT SAYETH NAUGHT.

Stephen Jensen

Affiant Signature

Printed Name: Stephen Jensen

Title: Chairman

Sworn to and subscribed before me this 12th day of June, 2025.

Lisa N Reed

Notary Public

My Commission Expires: 10-18-2029

