



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

JUN - 4 2014

GREGORY SLATE

Vs.

C.A. No. 2014 CA 002235 B

THE DISTRICT OF COLUMBIA et al

INITIAL ORDER AND ADDENDUM

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("SCR Civ") 40-I, it is hereby **ORDERED** as follows:

(1) Effective this date, this case has assigned to the individual calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption. On filing any motion or paper related thereto, one copy (for the judge) must be delivered to the Clerk along with the original.

(2) Within 60 days of the filing of the complaint, plaintiff must file proof of serving on each defendant: copies of the Summons, the Complaint, and this Initial Order. As to any defendant for whom such proof of service has not been filed, the Complaint will be dismissed without prejudice for want of prosecution unless the time for serving the defendant has been extended as provided in SCR Civ 4(m).

(3) Within 20 days of service as described above, except as otherwise noted in SCR Civ 12, each defendant must respond to the Complaint by filing an Answer or other responsive pleading. As to the defendant who has failed to respond, a default and judgment will be entered unless the time to respond has been extended as provided in SCR Civ 55(a).

(4) At the time and place noted below, all counsel and unrepresented parties shall appear before the assigned judge at an Initial Scheduling and Settlement Conference to discuss the possibilities of settlement and to establish a schedule for the completion of all proceedings, including, normally, either mediation, case evaluation, or arbitration. Counsel shall discuss with their clients **prior** to the conference whether the clients are agreeable to binding or non-binding arbitration. **This order is the only notice that parties and counsel will receive concerning this Conference.**

(5) Upon advice that the date noted below is inconvenient for any party or counsel, the Quality Review Branch (202) 879-1750 may continue the Conference **once**, with the consent of all parties, to either of the two succeeding Fridays. Request must be made not less than six business days before the scheduling conference date. No other continuance of the conference will be granted except upon motion for good cause shown.

(6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each Judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Lee F. Satterfield

Case Assigned to: Judge JOHN M MOTT

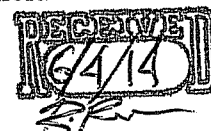
Date: April 10, 2014

Initial Conference: 10:00 am, Friday, July 11, 2014

Location: Courtroom 221

500 Indiana Avenue N.W.

WASHINGTON, DC 20001



**ADDENDUM TO INITIAL ORDER AFFECTING
ALL MEDICAL MALPRACTICE CASES**

In accordance with the Medical Malpractice Proceedings Act of 2006, D.C. Code § 16-2801, et seq. (2007 Winter Supp.), "[a]fter an action is filed in the court against a healthcare provider alleging medical malpractice, the court shall require the parties to enter into mediation, without discovery or, if all parties agree[,] with only limited discovery that will not interfere with the completion of mediation within 30 days of the Initial Scheduling and Settlement Conference ("ISSC"), prior to any further litigation in an effort to reach a settlement agreement. The early mediation schedule shall be included in the Scheduling Order following the ISSC. Unless all parties agree, the stay of discovery shall not be more than 30 days after the ISSC." D.C. Code § 16-2821.

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at <https://www.dccourts.gov/pa/>. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. Two separate Early Mediation Forms are available. Both forms may be obtained at www.dccourts.gov/medmalmediation. One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Both forms also are available in the Multi-Door Dispute Resolution Office, Suite 2900, 410 E Street, N.W. Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to earlymedmal@dcsc.gov. *Pro se* Plaintiffs who elect not to eFile may file by hand in the Multi-Door Dispute Resolution Office.

A roster of medical malpractice mediators available through the Court's Multi-Door Dispute Resolution Division, with biographical information about each mediator, can be found at www.dccourts.gov/medmalmediation/mediatorprofiles. All individuals on the roster are judges or lawyers with at least 10 years of significant experience in medical malpractice litigation. D.C. Code § 16-2823(a). If the parties cannot agree on a mediator, the Court will appoint one. D.C. Code § 16-2823(b).

The following persons are required by statute to attend personally the Early Mediation Conference: (1) all parties; (2) for parties that are not individuals, a representative with settlement authority; (3) in cases involving an insurance company, a representative of the company with settlement authority; and (4) attorneys representing each party with primary responsibility for the case. D.C. Code § 16-2824.

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code § 16-2826. Any Plaintiff who is *pro se* may elect to file the report by hand with the Civil Clerk's Office. The forms to be used for early mediation reports are available at www.dccourts.gov/medmalmediation.

Chief Judge Lee F. Satterfield



Superior Court of the District of Columbia
CIVIL DIVISION

500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone: (202) 879-1133

Gregory S. Kite

Plaintiff

14-0002235

vs.

Case Number

The United States

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty (20) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the party plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within five (5) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Name of Plaintiff's Attorney Greg S. Kite
PO Box 21020
Address Washington DC 20009
202-907-7526
Telephone

By

Date

Clerk of the Court

Deputy Clerk

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

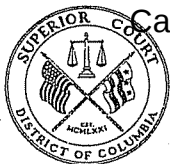
번역을 원하시면, (202) 879-4828 로 전화하십시오

የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-682-2700) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



Superior Court of the District of Columbia
CIVIL DIVISION

500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone: (202) 879-1133

Regency State

Plaintiff

14-0002235

vs.

Case Number

Van Park

Defendant

SUMMONS

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Name of Plaintiff's Attorney

Gregory

Address

*P.O. Box 21070
Washington DC 20009*

Telephone

如需翻译,请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

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Clerk of the Court

By

Deputy Clerk

Date

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Vea al dorso la traducción al español

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

GREGORY SLATE

Plaintiff,

v.

THE DISTRICT OF COLUMBIA

SERVE:

Vincent C. Gray
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

SERVE:

Office of the Attorney General
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

and

JAMES BOTELER

~~In his individual and~~ official capacities
Metropolitan Police Department
300 Indiana Avenue, N.W.
Washington, DC 20001

and

ANITA MAULFAIR

Aka Anita Jackson

~~In her individual and~~ official capacities
Metropolitan Police Department
300 Indiana Avenue, N.W.
Washington, DC 20001

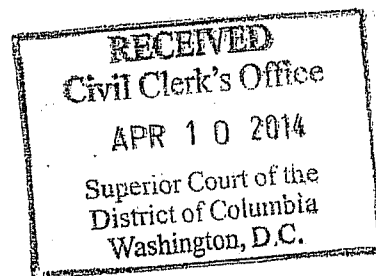
and

JOHN CARRUTHERS

~~In his individual and~~ official capacities
Metropolitan Police Department
300 Indiana Avenue, N.W.
Washington, DC 20001

14 Civ. Action No. 235

JURY TRIAL DEMANDED



and)

JUANITA MITCHELL)

~~In his individual and~~ official capacities)

Metropolitan Police Department)

300 Indiana Avenue, N.W.)

Washington, DC 20001)

and)

DAVID TAYLOR)

~~In his individual and~~ official capacities)

Metropolitan Police Department)

300 Indiana Avenue, N.W.)

Washington, DC 20001)

and)

Wilfredo Manlapaz)

~~In his individual and~~ official capacities)

Metropolitan Police Department)

300 Indiana Avenue, N.W.)

Washington, DC 20001)

and)

UNIDENTIFIED JOHN DOE)

POLICE OFFICERS)

~~In his individual and~~ official capacities)

Metropolitan Police Department)

300 Indiana Avenue, N.W.)

Washington, DC 20001)

and)

ALFRED "BLACK MAMBA" HAYES)

~~In his individual and~~ official capacities)

D.C. Department of Corrections)

1901 D Street, S.E.)

Washington, DC 20002)

and)

KAREN DEVALERA)

~~In his individual and~~ official capacities)

D.C. Department of Corrections)

1901 D Street, S.E.)

Washington, DC 20002)
)
and)
)
WILLIAM WILLIAMS, JR.)
~~In his individual and~~ official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
)
)
and)
)
ARDEN BUSHEE)
~~In his individual and~~ official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
)
)
and)
)
CURTIS "SIX NINE" THOMAS)
~~In his individual and~~ official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
)
)
and)
)
MARIA AMATO)
~~In his individual and~~ official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
)
)
and)
)
CORRECTIONAL OFFICER GREEN)
~~In his individual and~~ official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
)
)
and)
)
UNIDENTIFIED JOHN DOE)
CORRECTIONAL OFFICERS)

In his individual and official capacities)
D.C. Department of Corrections)
1901 D Street, S.E.)
Washington, DC 20002)
and)
THE UNITED STATES,)
UNIDENTIFIED JOHN DOE)
U.S. MARSHAL SERVICE MARSHALS)
In his individual and official capacities))
United States Marshals Service)
555 4th Street, N.W.)
Washington, DC 20001)
and)
MEDICAL FACULTY ASSOCIATES)
INC., T/A GEORGE WASHINGTON)
MEDICAL FACULTY ASSOCIATES)
2150 Pennsylvania Avenue, S.W.)
Serve: Resident Agent, CSC)
1090 Vermont Avenue, N.W.)
Washington, DC 20005)
and)
HOWARD UNIVERSITY HOSPITAL)
Serve: Office of General Counsel)
2400 6th Street, N.W.)
Washington, DC 20059)
and)
WASHINGTON HOSPITAL CENTER)
CORPORATION)
Serve: CT Corporation System)
1015 15th Street, N.W., #1000)
Washington, DC 20059)
and)
CRIME VICTIMS COMPENSATION)
PROGRAM)

Serve: Laura Banks Reed)
 515 5th Street, N.W.)
 Washington, DC 20001)
)
 and)
)
 LouEthel Green-Williams)
 515 5th Street, N.W.)
 Washington, DC 20001)
)
 and)
)
 Jin Park)
 515 5th Street, N.W.)
 Washington, DC 20001)
)
 Defendants.)
)

COMPLAINT

Plaintiff, Gregory Slate (hereinafter "Slate") brings this civil action against the following Defendants employed by the District of Columbia Metropolitan Police Department ("MPD"): James Boteler, Anita Maulfair AKA Anita Jackson, John Carruthers, Juanita Mitchell, David Taylor, Wilfredo Manlapaz, Unidentified John Doe Police Officers; the following Defendants employed by the District of Columbia Department of Correction ("DOC"): Alfred Hayes AKA the Black Mamba, Karen DeValera, William Williams, Jr. Arden Bushee, Curtis Thomas AKA Six Nine, Correctional Officer Green, Maria Amato, Unidentified John Doe Correctional Officers; the following Defendant hospitals ("Hospital Defendants"): Medical Faculty Associates, Inc., T/A George Washington Medical Faculty Associates, Howard University Hospital, and Washington Hospital Center, and, Unidentified John Doe US Marshal Service Marshals, Jin Park, LouEthel Green-Williams, and the Crime Victims Compensation Fund for violations of his Fourth Amendment, First Amendment, Fifth Amendment, 42 U.S.C. §1983 violations of Due Process Rights under the Fourteenth Amendment, violations of the Fair Debt

Collection Practices Act 15 U.S.C. §1692, Negligent Hiring, Battery, Trespass to Chattel, Conversion, Libel, Tortious Interference with Contractual Relations, False Arrest, Assault, Battery, Trespass, Malicious Prosecution, Negligence and Intentional Infliction of Emotional Distress.

NATURE OF PROCEEDING

Plaintiff brings this suit to redress injuries and losses suffered as a consequence of unlawful arrest and detention as hereinafter alleged.

PARTIES

1. Plaintiff is an Emmy award winning investigative journalist whose work focuses on police misconduct and corruption. At all times relevant hereto Plaintiff was the owner operator of a going real estate investment concern. Plaintiff maintains his primary place of business within the District of Columbia.

2. Defendant, James Boteler ("Boteler"), is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States.

3. Defendant, Anita Maulfair ("Maulfair") aka Anita Jackson, is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States. Prior to her employment with MPD Defendant Maulfair was suspended from the Houston Police Department after a finding that she "failed to follow basic police procedures and failed to use reasonable and prudent judgment" when she conducted a warrantless raid of a fellow police officer's hotel room.

4. Defendant, John Carruthers ("Carruthers"), is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States.

5. Defendant, Juanita Mitchell ("Mitchell"), is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States.

6. Defendant, David Taylor ("Taylor"), is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States.

7. Defendant, Wilfredo Manlapaz ("Manlapaz"), is an officer of the District of Columbia Metropolitan Police Department ("MPD") and upon information and belief, is an adult citizen of the United States.

8. Defendant Unidentified Metropolitan Police Officers are and were, at all times relevant to this Complaint, employed by MPD. At all times relevant to this Complaint, Unidentified Metropolitan Police Officers were acting under color of law within the scope of their employment at MPD. Unidentified Metropolitan Police Officers are sued in their individual and official capacities.

9. The Metropolitan Police Department is an Agency of the District of Columbia Government with its principle offices in the District of Columbia.

10. The municipal government of the District of Columbia operates the DOC. The District of Columbia maintains government offices at 1350 Pennsylvania Avenue, NW, Washington, D.C. 20004.

11. Defendant Alfred Hayes AKA the Black Mamba (hereinafter "Defendant Black Mamba") is a Correctional Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

12. Defendant Arden Bushee is a Correctional Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

13. Defendant William Williams, Jr. is a Correctional Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

14. Defendant Curtis Thomas AKA the Six Nine is a Correctional Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

15. Defendant Officer Green is a Correctional Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

16. Defendant Maria Amato is an employee of the DOC. Her business address is 1901 D Street, S.E., Washington, D.C. 20002.

17. Defendant Karen DeValera is an Officer with the DOC. His business address is 1901 D Street, S.E., Washington, D.C. 20002.

18. The Crime Victims Compensation Program is an Agency of the Superior Court of the District of Columbia with its principle offices in the District of Columbia.

19. On information and belief, Defendant Jin Park is a natural person that maintains her primary residence in Virginia and is an employee of the United States Attorney's Office.

20. On information and belief, Defendant LouEthel Green-Williams is a natural person that maintains his primary residence in Cicero, Illinois and is an employee of the Crime Victims Compensation Program.

21. Defendant Unidentified U.S. Marshals Service Marshals are and were, at all times relevant to this Complaint, employed by the United States Marshals Service ("USMS"). At all times relevant to this Complaint, Unidentified U.S. Marshals Service Marshals were acting under color of federal law within the scope of their employment at USMS. Unidentified U.S. Marshals Service Marshals are sued in their individual and official capacities.

JURISDICTION AND VENUE

1 Jurisdiction of this court is invoked pursuant to D.C. Code, Section 11-921(1981 Edition).

2 Venue is proper in this Court because Plaintiff is an individual doing business in the District of Columbia and the facts upon which this claim is based occurred within the District of Columbia.

FACTS COMMON TO ALL COUNTS

22. On or about the evening of October 26 Plaintiff was solicited by a colleague to assist in documenting and filming alleged police harassment and the raid of a business located at 1802 Adams Mill Rd NW in the Adams Morgan neighborhood in the District of Columbia.

23. As Plaintiff filmed the police raid from the sidewalk, an MPD officer approached Plaintiff and began taking pictures of his face. Several minutes later another MPD officer aggressively charged Plaintiff, began chasing him down the street and threatened him with arrest if he continued to film.

24. After Plaintiff stopped filming, MPD officers followed him as he walked home and took pictures of Plaintiff's house.

25. On or about the evening of October 28 Plaintiff was again solicited by a colleague to assist in documenting and filming alleged police harassment and the raid of "B&K New Stand" a different business located at 2414 18th Street NW in the Adams Morgan neighborhood.

26. Plaintiff filmed at least one officer stealing items from B&K News Stand during the raid.

27. In or around early November MPD Defendant Boteler and other unidentified MPD officers dressed in plainclothes ambushed Plaintiff as he walked down the 3100 block of Mount Pleasant Street, N.W.

28. Without warning Defendant Boteler threw Plaintiff against a wall and rummaged through his pockets.

29. Defendant Boteler removed Plaintiff's identification from his wallet, read his address aloud, and told Plaintiff "I'll be keeping an eye on you."

30. Plaintiff was released and the officers never provided a reason for the stop.

31. On or about December 10 Plaintiff called 911 to report a disturbance in the 1700 block of Kilbourne Place NW.

32. Approximately ten minutes after the first officers arrived, Defendant Boteler and members of his "Crime Suppression Unit" arrived.

33. When Defendant Boteler arrived he and other officers burst inside the building that Plaintiff leased at 1708 Kilbourne Place NW ("1708") and began searching it.

34. Plaintiff told Defendant Boteler that he did not have permission to enter 1708 and asked him to leave or produce a warrant.

35. MPD officers detained Plaintiff while Defendant Boteler searched the first floor of 1708.

36. After Defendant Boteler searched the first floor of 1708 he went up three flights of stairs to the third floor where Plaintiff maintained an office.

37. Defendant Boteler forced open a closed closet door inside Plaintiff's third floor office and removed files Plaintiff maintained on MPD officers and the MPD raids in Adams Morgan.

38. Defendant Boteler stood on a chair to reach and search a closed drawer inside the closet in Plaintiff's third floor room.

39. Knowing that Plaintiff had not engaged in any criminal conduct Defendant Boteler then arrested Plaintiff for felony assault with a deadly weapon and unlawful possession of ammunition.

40. Upon hearing that Plaintiff was being charged with a felony, Plaintiff had a severe panic attack and was transported to the George Washington University Hospital ("GWHC") for treatment.

41. Plaintiff, who was uninsured at the time, told the GWHC that he did not want treatment because he was uninsured. GWHC told Plaintiff that because he was in police custody the District of Columbia would pay for his treatment and he would not be held liable for any costs.

42. After receiving treatment unidentified Metropolitan Police Officers forced Plaintiff to sign various forms, which had not been filled out and without allowing Plaintiff to read what he was signing.

43. After his release from GWUH, Plaintiff was placed in a holding cell where he remained overnight. The morning of December 10 Plaintiff appeared before Judge Florense Pan of the District of Columbia Superior Court and was released on personal recognizance.

44. On Sunday, December 11 an Unidentified Metropolitan Police officer accompanied by one of Plaintiff's former tenants entered Plaintiff's property at 1708 without consent, a warrant, or probable cause to believe a crime had occurred and removed several items from a room of the third floor of 1708. The Unidentified Metropolitan Police officer refused to leave after Plaintiff's domestic partner repeatedly told him he did not have permission to be on the property at 1708.

45. As a result of the Unidentified Metropolitan Police officer's illegal entry onto the premises at 1708 Plaintiff had a severe panic attack, became short of breathe and suffered a severe bout of tachycardia for fifteen minutes.

46. On December 16 Defendant Boteler and several members of the Crime Suppression Unit executed a search warrant at 1708 by kicking down Plaintiff's door.

47. Defendant officers neither knocked on the door nor identified themselves as police officers before they forced entry into 1708. Knocking and announcing their presence would not have been useless, nor would it have created a risk of physical violence, and no exigent circumstances existed that would have justified a no-knock entry. Defendant officers were neither actually nor constructively refused admittance to the house before they forced entry.

48. Upon entering the house, one group of John Doe MPD Officers ascended the stairs to second floor of 1708 as Plaintiff descended the stairs from the third floor. Upon reaching the second floor of 1708 and encountering Plaintiff in the hall, the MPD Officer pointed an assault rifle directly at Plaintiff's face and shouted, "Get on the floor motherfucker! We are going to kill you." In response, Plaintiff immediately laid down on the floor.

49. Plaintiff was handcuffed and taken to the first floor of 1708.

50. While on the first floor Plaintiff was with Defendant Boteler and asked him if he had a warrant to provide his name and badge number. Defendant Boteler responded, "Fuck you I am not telling you anything."

51. Defendant Boteler then removed Plaintiff's Emmy Award that was sitting on top of his television and deliberately dropped it on the floor.

52. Defendant Boteler then walked to a Plaintiff's humidor, removed a cigar, smelled it, and placed it in his pocket.

53. The cigar was not listed as an item seized during the execution of the search warrant because Defendant Boteler sold the cigar from Plaintiff for his personal use and benefit.

54. During the search, MPD officers intentionally destroyed video footage of police misconduct Plaintiff had captured by breaking open video tapes, removing and ripping the ribbons and breaking DVD's in half.

55. For no reason, Defendant Boteler smashed the glass of Plaintiff's photocopier and other officers smashed computer monitor screens and broke frames containing copies of Plaintiff's degrees and certificates that were hung on Plaintiff's wall.

56. During the search MPD officers found a substance in the laundry room of 1708.

57. The officers conducted a field test of the substance. The results of the field test indicated that the substance was not a controlled substance.

58. Knowing that the substance was not controlled Defendant Boteler instructed the MPD officer to identify the substance as amphetamines.

59. Defendant Boteler charged Plaintiff with possession of methamphetamines even though he knew that no methamphetamines had been found at 1708.

60. Upon hearing that Plaintiff was again being falsely charged with a crime by Defendant Boteler, Plaintiff suffered a severe panic attack, began trembling and become short of breathe and was transported to Howard University Hospital.

61. Plaintiff told Howard University Hospital that he was uninsured and did not want to be treated. The Hospital and Unidentified MPD Officer's told Plaintiff that because he was in police custody the District of Columbia's insurance would pay for Plaintiff's medical treatment and Plaintiff would not be liable for any costs.

62. Unidentified Metropolitan Police Officers forced Plaintiff to sign various forms that had not been filled out and without allowing Plaintiff to read what he was signing.

63. After his release from Howard University Hospital Plaintiff was placed in a holding cell where he remained overnight. The following morning of December 17, 2011, Plaintiff appeared before Judge Brian F. Holeman of the District of Columbia Superior Court who refused to grant Plaintiff a bond.

64. Plaintiff was transport to the District of Columbia Detention Center where he was held for the next seven days.

65. The morning of December 23, Plaintiff appeared before Judge Kimberly S. Knowles of the District of Columbia Superior Court and was released on personal recognizance.

66. On December 30 without a warrant, probable cause to believe a crime had been committed, or consent Defendant Boteler and other Unidentified MPD officers entered 1708 and pointed a gun and assault rifle at the head of one of Plaintiff's tenants, stormed into 1708 and searched the entire building. As Defendant Boteler left he told Plaintiff's tenants that he would be back everyday and that they should move out.

67. As a result of Defendant Boteler's trespass at 1708 two of Plaintiff's tenants abandoned their tenancy and Plaintiff lost rental income he would have had but for Defendant Boteler's December 30 trespass.

68. On or about January 4 Defendant Carruther, the Unidentified USMS Marshals and unidentified MPD officers from the fifth district kicked down the door of the building Plaintiff leases at 35 Bryant Street, NW without a search warrant, consent, or probable cause.

69. While inside 35 Bryant Street, NW an unidentified USMS Marshal told Plaintiff's tenant that Plaintiff was engaged in financial fraud and to close the bank account from which Plaintiff deducted the tenants rent each month.

70. Plaintiff has never engaged in or been charged with financial fraud and as a result of Defendant Unnamed Marshal's and MPD officer's knowing misrepresentation Plaintiff's tenants at 35 Bryant Street, NW stopped paying rent and moved out causing Plaintiff to lose the rental income he would have otherwise earned but for the Marshal's misrepresentation.

71. After MPD and USMS's warrantless raid of 35 Bryant Street, NW MPD officers and USMS Marshal placed Plaintiff under arrest for two counts of felony contempt of court. As a result of the raid and the new false contempt charges Plaintiff suffered another severe panic attack and had to be transported to the Washington Hospital Center.

72. Plaintiff told the Washington Hospital Center that he was uninsured and did not want to be treated. The Washington Hospital Center told Plaintiff that because he was in police custody the District of Columbia's insurance would pay for Plaintiff's medical treatment and Plaintiff would not be liable for any costs.

73. Unidentified Metropolitan Police Officers forced Plaintiff to sign various forms that had not been filled out and without allowing Plaintiff to read what he was signing.

74. After his release from the hospital Plaintiff was placed in a holding cell where he remained overnight. The following morning of January 5, Plaintiff appeared before Judge Karen Howze of the District of Columbia Superior Court who found that the charging document used to arrest Plaintiff lacked probable cause and granted to United States 24 hours to attempt to perfect the document and held Plaintiff without bond.

75. The stress of the daily court hearings necessary so that MPD could perfect the false charges that they were accusing Plaintiff of, caused Plaintiff's blood pressure to sky rocket and on January 5, Plaintiff had to be hospitalized again and was taken to the Howard University Hospital.

76. Plaintiff asked the Howard University Hospital if, because he was in police custody, the Hospital would bill the District of Columbia for Plaintiff's treatment. The Howard University Hospital confirmed that because he was in police custody the District of Columbia's insurance would pay for Plaintiff's medical treatment and Plaintiff would not be liable for any costs.

77. Unidentified Metropolitan Police Officers forced Plaintiff to sign various forms that had not been filled out and without allowing Plaintiff to read what he was signing.

78. After his release from the hospital Plaintiff was returned to DOC where he remained incarcerated for the next four months.

79. On or about January 17, outside of court after Plaintiff's bail hearing and while acting outside of her advocacy role as a prosecutor, Defendant Park conducted an interview with a potential witness and told the witness that Plaintiff had done "a very, very bad thing". After the hearing Plaintiff was returned to DOC.

THE ABHORANT CONDITIONS AT THE DOC

80. During his incarceration at the DOC Plaintiff was forced to live in squalid, unhygienic, and hazardous living conditions that resulted in substantial harm to his physical and mental health.

81. While incarcerated Plaintiff was subjected to inhumane conditions that deprived him of the basic human need for a sanitary and warm environment.

82. The plumbing problems at DOC created an unsanitary environment for Plaintiff by exposing him to human waste on a regular and ongoing basis during his incarceration.

83. While incarcerated at DOC Plaintiff was housed in various cells through the facility. Each individual cell contained a toilet that sat two to three feet away from Plaintiff's bed. In at least three of the cells Plaintiff was housed in, flushing a toilet in an adjoining or nearby cell caused sewage to rise up in Plaintiff's toilet.

84. Nearly every day while Plaintiff was housed in cells with defective toilets, the toilets would collect waste from those in neighboring cells and on four separate occasions that waste overflowed onto the Plaintiff's cell floor.

85. The accumulated waste caused Plaintiff to regularly vomit, cough, and suffer from nausea and severe headaches due to the fumes.

86. Living in close proximity to human waste is a health hazard. Human excrement carries harmful microorganisms, which can cause diarrhea, fever, cramps, and vomiting, in addition to more severe conditions. Persons in close proximity to human waste can contract parasites or hepatitis and develop skin and eye infections.

87. While at DOC Plaintiff was forced to wear the same soiled jumpsuit and underwear for weeks on end because the laundry facilities at DOC were not functioning and the inmates were not provided laundry services.

88. When Plaintiff was allowed to shower, a right he was frequently denied, he was forced to use a decrepit shower stall, coated with thick, black mold, and reeking of mildew and without hot water.

89. Frequently sewage backed up out of the shower drains, and there was often standing water in the shower stall because the drains were clogged, causing Plaintiff to develop painful skin conditions.

90. Plaintiff tried not to touch anything in the showering area in an attempt to avoid direct contact with the mold, mildew, and sewage. But due to the narrow size of the stalls, and inadequate footwear, the Plaintiff often came into contact with these substances while showering.

91. The mold at DOC was not limited to the shower stalls. In Plaintiff's cell, sinks which he used to access drinking water and wash his spoons, cups, and clothes, were also lined with mold. There was also mold on the walls of the Plaintiff's cells.

92. During Plaintiff's incarceration he complained to the Department of Health which sent inspectors who verified the existence of these conditions.

93. After being cited by the Department of Health for the existence of the dangerous mold DOC staff attempted on various occasions to mask mold by painting directly over it. The paint could not contain the mold growth, however, and chips of moldy paint frequently drop into Plaintiff's living spaces, including onto Plaintiff's beds.

94. According to the U.S. Centers for Disease Control and Prevention and the World Health Organization, exposure to mold – particularly indoors – can lead to upper respiratory tract problems in otherwise healthy people, including bronchitis, which can become chronic. Mold can also cause serious lung infections, exacerbate asthma symptoms in persons with asthma, and cause otherwise healthy people to develop asthma. Mold exposure can also cause people to

develop ongoing allergies that will linger with them even after they are no longer exposed to high concentrations of mold.

95. Alongside the general filth, Plaintiff was forced to live in very cold temperatures in the wintertime, causing him severe discomfort, particularly at night.

96. Lack of heat for extended periods disrupts sleep patterns, causes stress, and increases susceptibility to disease.

97. Plaintiff repeatedly filed "Inmate Grievances", "Emergency Inmate Grievances", and appeals, and final appeal of those grievances in an attempt to have the plumbing issues in his cell corrected or to be relocated to another cell with a properly functioning toilet.

98. Instead of remediating the problems Plaintiff complained about, the correctional officers working at DOC retaliated against Plaintiff to discourage him from complaining.

99. A favored means of retaliation by correctional officers at DOC was to shut of inmates' drinking water for extended periods of time.

100. Plaintiff's water was turned off in similar acts of retaliation on more than five different occasion by Defendant Alfred "Black Mamba" Hayes, Defendant William Williams, Jr., and Defendant Okura.

101. Each time Plaintiff's water was turned off it remained off for more than one day causing Plaintiff to become severely dehydrated and leaving Plaintiff unable to flush his toilet resulting in the accumulation of fecal material, which caused Plaintiff to vomit repeatedly.

Inmate Violence and Sexual Assaults and Institutionalized Torture by Officers At DOC

102. As soon as Plaintiff arrived at DOC he informed the staff that he was a former Felony One Staff Investigator at the Public Defender's Service, that he had been threatened by other inmates who recognized Plaintiff from his work as a defense investigator and mistakenly

believed that he was a law enforcement officer and that Plaintiff needed to be separated from other inmates who intended to do him harm.

103. Despite Plaintiff's warning to the DOC that he was in danger and needed protection on Plaintiff was placed in general population in Southeast One, the most violent tier at DOC.

104. When Plaintiff was placed in Southeast One he was assigned to share a cell with a violent felon.

105. The first time Plaintiff went to sleep in his cell in Southeast One he was awoken by a sharp blow to his head by his cellmate. Plaintiff's cellmate beat him about the face and stomach until Plaintiff was knocked unconscious. During the beating Plaintiff's cellmate repeatedly referred to Plaintiff as "a police".

106. The next morning Plaintiff's cellmate told Plaintiff that if he reported the assault the cellmate would insure that Plaintiff would not make it out of jail alive.

107. After Plaintiff was attacked, he began having acute dental pain and began requesting the treatment of a dentist on an almost daily basis

108. All of Plaintiff's requests to see a dentist were ignored.

109. Plaintiff repeatedly filed written requests for dental treatment and grievances, emergency grievances, and grievance appeals concerning DOC's refusal to allow Plaintiff to see a dentist.

110. Plaintiff was never allowed to see a dentist or given any pain medication to treat the constant pain that he was in and eventually Plaintiff's tooth fell out.

111. Judge Patricia A. Broderick order the Department of Corrections to place Plaintiff in "complete separation while held due to assaults and threats".

112. The DOC ignored Judge Broderick's order to place Plaintiff in "complete separation" for several weeks.

113. Thereafter, a DOC Correctional Officer known to Plaintiff only as "Izuhu" began making sexual advances towards Plaintiff.

114. On multiple occasions Defendant Izuhu demanded, without any lawful reason, that Plaintiff undress. When Plaintiff complied Defendant Izuhu would shine a light on Plaintiff's genitalia while Defendant Izuhu rubbed his groin for sexual gratification.

115. On multiple occasions Defendant Izuhu removed Plaintiff from his cell and groped Plaintiff's body and genitals for Defendant Izuhu's sexual gratification.

116. Plaintiff filed a grievance concerning Defendant Izuhu's sexual assault, harassment and humiliation but DOC did nothing to protect Plaintiff.

117. Defendant Bushee received Plaintiff's grievance concerning Defendant Izuhu's conduct. Defendant Bushee read Plaintiff's grievance aloud in front of Defendant Green and several correctional officers who worked on the tier where Plaintiff was housed.

118. After Defendant Bushee read Plaintiff's grievance aloud in front of other correctional officers, several of the officers endeavored to retaliate against Plaintiff by tormenting him in a variety of ways.

119. In an effort to retaliate against Plaintiff for his grievances Defendant Green loudly announced on the tier so that the predominately African-American inmate population could hear that Plaintiff, who appears to be a Caucasian, was probably a member of the "KKK".

120. In an effort to retaliate against Plaintiff for his grievances Defendant Green would come to Plaintiff's cell and loudly blow his whistle every time Plaintiff went to sleep.

121. On several occasions Defendant Green would instruct Plaintiff to place his ear close to the holes in his cell door so that Defendant Green could tell Plaintiff something. When Plaintiff would put his is close to the door Defendant Green would blow his whistle as loudly as possible.

122. Plaintiff suffered hearing loss and persistent ringing in his ears as a result of Defendant Green loudly blowing a whistle close to his ear.

123. Sexual assault and humiliation of inmates by guards is a systemic problem at DOC and Plaintiff faced similar treatment from other correctional officers at DOC.

124. Defendant Hayes who refers to himself as "Black Mamba" has a reputation of torturing and humiliating inmates at DOC.

125. Whenever Defendant Black Mamba encountered Plaintiff, Defendant Black Mamba asked Plaintiff humiliating and degrading questions about Plaintiff's sexual habits.

126. During Plaintiff's incarceration Defendant Black Mamba demanded that Plaintiff tell him how many time he masturbated each day.

127. During Plaintiff's incarceration Defendant Black Mamba demanded that Plaintiff describe to Defendant Black Mamba Plaintiff's first sexual encounter.

128. During Plaintiff's incarceration Defendant Black Mamba demanded that Plaintiff answer humiliating and embarrassing questions of a sexual nature.

129. If Plaintiff refused to entertain Defendant Black Mamba's questions, Defendant Black Mamba would punish Plaintiff in a variety of way, including but not limited to tightening Plaintiff's handcuffs, confiscating Plaintiff's reading material, shutting off the water to Plaintiff's cell, refusing to allow Plaintiff out of his cell for days, refusing to allow Plaintiff to shower, and other physically and emotionally harmful acts.

130. Plaintiff repeatedly filed grievances about Defendant Black Mamba's conduct but DOC ignored the complaints.

131. More than a month after Judge Broderick ordered Plaintiff be held in "complete separation" but before DOC placed Plaintiff in "complete separation" an inmate approached the slot in Plaintiff's cell door and doused Plaintiff's cell with a bottle of liquid containing a combinations of other inmates feces and urine. As this happened the DOC Correctional Officer's on duty watched and did nothing.

132. Prior to the attack Plaintiff repeatedly contacted Defendant Amato to notify the DOC of its failure to comply with the court's order but Defendant Amato continued to ignore the court's order.

133. Had Defendant Amato taken any reasonable steps to insure compliance with the court's order the inmate who assaulted Plaintiff would not have been able to do so because Plaintiff would have been completely separated from other inmates.

134. Prior to the urine and feces attack, Plaintiff and the other inmates on his tier had not been provided laundry service for at least three weeks. Even though Plaintiff's clothes were now stained in fecal matter and reeked of noxious fumes the correctional officers still refused to provide Plaintiff laundry services.

135. Plaintiff and other inmates incarcerated in the South Two tier of DOC organized a protest because the lack of laundry services was causing the entire tier to smell of stagnant body odor and caused several inmates, including Plaintiff, to develop skin infections.

136. Each inmate on the South Two tier threw their soiled bedding and jumpsuits on to the tier and refused to reclaim them until they were laundered.

137. After the inmates threw their clothing on the tier a supervising correctional officer Defendant Thomas who goes by the alias "6'9'" because of his height, entered the tier and began threatening to "beat the ass" of each of the protesting inmates.

138. After Defendant Thomas finished threatening the men, he activated a video recorder and began recording the condition of the tier. As Defendant Thomas video taped, Plaintiff asked him why he had been threatening the inmates to which Defendant Thompson responded, "I'ma gonna bust yo ass!"

139. Defendant Thomas then turned off the water to Plaintiff's cell.

140. Defendant Thomas also ordered his subordinates to launder every other inmates clothing except Plaintiff's and not to return Plaintiff's clothing until he ordered otherwise.

141. When questioned about why he turned off Plaintiff's water and would not launder Plaintiff's clothes Defendant Thomas stated, "To teach you a lesson."

142. Throughout Plaintiff's incarceration Plaintiff repeatedly sent copies of Grievances, Emergency Grievances, Grievance Appeals, Third Level Grievance Appeals, Final Appeals, and pleas for assistance to Defendant Amato who ignored each.

143. After Plaintiff was moved to "complete separation" the torture and harassment only got worse because DOC assigned Defendant Black Mamba to work on the "complete separation" unit where Plaintiff was housed.

144. On Plaintiff's birthday, Defendant Black Mamba celebrated by intensifying the torture regimen he designed for Plaintiff.

145. On the morning of Plaintiff's birthday Defendant Black Mamba entered the tier where Plaintiff was housed and began announcing his presence by repeatedly screaming, "The Black Mamba is back! You thought I was gone but I'm back!"

146. After announcing himself Defendant Black Mamba proceeded directly to Plaintiff's cell and began violently beating the cell door with his fist to knock it off of its track so Plaintiff would be trapped inside.

147. After Defendant Black Mamba trapped Plaintiff in his cell by knocking the door off its tracks other correctional officer's were summoned to force the door back on the tracks.

148. When the other guard attempted to fix the door Defendant Black Mamba became enraged and began beating the window in the hall outside Plaintiff's cell.

149. After Plaintiff's cell door was fixed Defendant Black Mamba forced Plaintiff to strip naked for no reason.

150. Defendant Black Mamba then put handcuffs on Plaintiff and tightened them around Plaintiff's wrists so hard that the blood circulation to Plaintiff's hands was cut off and they turned blue.

151. Defendant Black Mamba then wrenched Plaintiff's arms and thrust him hard into a cell door for no reason.

152. Prior to Defendant Black Mamba's attack, Plaintiff had apprised Defendant Amato of Defendant Black Mamba's reputation and practice of torturing Plaintiff and asked her to insure that Plaintiff be separated from Defendant Black Mamba. Defendant Amato ignored Plaintiff's pleas knowing such an assault would occur if she did not do something.

The Trial, Acquittal, and Dismissal of All Charges

153. On April 23 was acquitted of all firearms related charges and both counts of contempt of court.

154. After a hearing on October 22 Judge Maris J. Demeo of the District of Columbia Superior court dismissed all of the false drug offenses Defendant Boteler filed against Plaintiff.

The Aftermath

155. As a direct and proximate result of the actions of the defendants, Plaintiff has suffered numerous injuries and damages, including physical pain and suffering, loss of liberty, emotional distress, shame, and humiliation.

156. As a direct and proximate result of the actions of the defendants, Plaintiff has lost his trust in the police and no longer feels safe or secure in his home.

157. In particular, defendant's actions have caused extreme psychological harm to Plaintiff. As a direct and proximate result of the actions of the defendants, Plaintiff now suffers from Major Depressive Disorder and Post-Traumatic Stress Disorder. The psychological impact of the home invasion has had a pervasive effect on his daily life activities, occupation, education, and social functioning. He suffers from recurring nightmares and persistently re-experiences the event via recurrent, intrusive distressing recollections that are triggered by external cues such as loud sounds and seeing police officers.

158. This psychological harm has affected Plaintiff's education. Before the events described herein, Plaintiff was attending George Washington University and was close to completing his Jurist Doctorate Degree. Afterward, he was forced to pause his legal education due to forgetfulness and the inability to focus caused by defendants' actions.

159. When he was released from incarceration Plaintiff learned that the District of Columbia had not paid for any of the medical treatment Plaintiff received while in custody and that Defendants George Washington University Hospital, Howard University Hospital, and Washington Hospital Center were demanding several thousand dollars in payment.

160. Plaintiff disputed that he is responsible for the aforesaid charges as he was informed prior to the procedures that he was pre-certified by George Washington University

Hospital, Howard University Hospital, and Washington Hospital Center with the District of Columbia's health insurance.

161. The Plaintiff, in the course of attempting to obtain credit, was advised that Defendants George Washington University Hospital, Howard University Hospital, and Washington Hospital Center had placed a delinquent credit rating in his credit report.

162. As a result of the delinquent credit report, Plaintiff was denied credit.

163. Having no health insurance, owing significant medical bills, and desperately needing medical treatment for the injuries he sustained resulting from various criminal acts, Plaintiff applied to the Crime Victims Compensation Program ("CVCP") to receive reimbursement for past and future medical expenses.

164. On or about September 14 Plaintiff submitted a claim to the CVCP which was assigned claim number 123367.

165. Defendant LouEthel Green-Williams, a Claims Examiner at the CVCP, refused to process Plaintiff's CVCP claim without "supporting documentation". In response Plaintiff submitted 911 calls, police reports, and other documentation memorializing Plaintiff's efforts to report the crimes he was a victim of leading up to and during his incarceration at DOC.

166. Defendant LouEthel Green-Williams refused to accepted any of Plaintiff's documentation and demanded that Plaintiff submit a "PD-251" and/or "PD-252" issued by MPD before the CVCP would processes Plaintiff's claim.

167. On or about September 14 Plaintiff contacted Defendant Juanita Mitchell at MPD and attempted to file a police report for one of the criminal assaults perpetrated against Plaintiff.

168. Defendant Wingate refused to allow Plaintiff to file a police report and/or issue a PD-251 concerning the assault and referred the matter to her subordinate Defendant Wingate.

169. Defendant Wingate refused to take any police report from Plaintiff and referred the matter to her supervisor Defendant Taylor.

170. Defendant Taylor refused to take any police report from Plaintiff and referred the matter to her supervisor Defendant Manlapaz.

171. In an effort to frustrate Plaintiff's efforts to file the necessary police report, Defendant Manlapaz refused to take a police report from Plaintiff or communicate with him

172. On or about March 12 Plaintiff contacted Defendant Karen DeValera, an internal affairs investigator assigned to investigate the assaults on Plaintiff at DOC, in an effort to obtain police reports of the same.

173. Defendant DeValera refused to provide Plaintiff with any document memorializing Plaintiff's reports of the assaults at DOC or any resulting investigation.

174. The District of Columbia refused to investigate or take reports concerning any of the crimes committed against Plaintiff and the CVCP refused to process any of Plaintiff's claims without an official report.

Other Matters

175. At all times relevant to this complaint, the MPD and DOC Defendants acted under color of law and within the scope of their employment.

176. The notice requirement of D.C. Code § 12-309 has been satisfied by a timely letter sent by Plaintiff (acknowledged and assigned claim numbers 1101291-000; 1201116-000; 1200490-000) and, on information and belief, by reports and records of the MPD, DOC and an investigation by the Office of Police Complaints (complaint number 12-0195).

COUNT I FOURTH AMENDMENT VIOLATIONS ON DECEMBER 10 (BOTELER AND UNIDENTIFIED MPD DEFENDANTS)

177. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

178. Fourth Amendment of the United States Constitution provides that people shall be "secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." U.S. Const. amend. IV.

179. Defendant Boteler's and the Unidentified MPD Defendant's December 10, 2011 detention and arrest of Plaintiff, and search of Plaintiff's house, are violations of Plaintiff's Fourth Amendment rights. In searching, seizing and detaining Plaintiff, Defendant Boteler and the Unidentified MPD Defendants exceeded the reasonable stop and frisk permitted under law. The intensity and scope of the search that followed Plaintiff's initial stop amounted to much more than a limited intrusion, as it included hours of detainment and Plaintiff was imprisoned overnight. Because Plaintiff's initial detainment and subsequent detention at the police station and in the holding cell were not narrow or limited in scope, they cannot be sustained as lawful

180. Defendant Boteler and the Unidentified MPD Defendants violated Plaintiff's Amendment rights by searching his house. This search, which was conducted without a warrant, did not fall into any Fourth Amendment exception. The Defendants' actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.

181. Defendant Boteler, and the Unidentified MPD Defendants also violated Plaintiff's Fourth Amendment rights protecting against false imprisonment and arrest. Plaintiff was both detained and restrained against his will, and his arrest was unlawful.

**COUNT II
TRESPASS ON DECEMBER 10 (BOTELER)**

182. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

183. During all relevant times hereto, Plaintiff occupied his property with intent to control the manner of use and enjoyment thereof.

184. Defendant Boteler, by going on the third floor of 1708, entered Plaintiff's property and failed to remove from the property after being told to leave and while under a duty to remove.

185. As a result of Defendant's trespass onto Plaintiff land, Plaintiff has sustained damages, including but not limited to compensatory damages, medical expenses, emotional distress, and attorney's fees.

COUNT III
FOURTH AMENDMENT VIOLATIONS ON DECEMBER 16 (BOTELER AND
UNIDENTIFIED MPD DEFENDANTS)

186. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

187. Fourth Amendment of the United States Constitution provides that people shall be "secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." U.S. Const. amend. IV.

188. Defendant Boteler's and the Unidentified MPD Defendant's December 16, 2011 detention and arrest of Plaintiff, and search of Plaintiff's house and destruction of the property therein, are violations of Plaintiff's Fourth Amendment rights. In searching, seizing and detaining Plaintiff, Defendant Boteler and the Unidentified MPD Defendants exceeded the reasonable stop and frisk permitted under law. The intensity and scope of the search that followed amounted to much more than a limited intrusion, as it included hours of detainment and Plaintiff was imprisoned overnight. Because Plaintiff's initial detainment and subsequent detention at the police station and in the holding cell were not narrow or limited in scope, they cannot be sustained as lawful.

189. The seizure, destruction and damage to Plaintiff's tapes, DVDS, computers, photocopier, computer monitor, frames, intellectual property in the form of his videos of police misconduct by MPD Defendants Boteler and Unidentified John Doe MPD Officers constitutes a Fourth Amendment Violation. Regardless of whether the Defendants were justified in searching Plaintiff's home and/or arresting Plaintiff, his Fourth Amendment rights were violated when they damaged and/or destroyed various tapes, DVD, computers, photocopier, computer monitor, frames, and intellectual property in the form of his videos of police misconduct. The damage and destruction of items in the house was unnecessary and unlawful. The destruction of the items in Plaintiff's house was not necessary to execute a search of the house. Furthermore, some of the items that were damaged exceeded the breadth of a lawful search because they could not possibly hold relevant evidence. Viewing the search in light of the totality of the circumstances, the disregard exercised by the MPD for the contents of Plaintiff's house amounted to callous disregard of another person's property. Additionally, Defendant Boteler's destruction of Plaintiff's DVDs and tapes also constituted a violation of the Fourth Amendment.

190. Defendant Boteler and the Unidentified MPD Defendants violated Plaintiff's Amendment rights by searching and destroying the items in his house. The Defendants' actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.

191. Defendant Boteler, and the Unidentified MPD Defendants also violated Plaintiff's Fourth Amendment rights protecting against false imprisonment and arrest. Plaintiff was both detained and restrained against his will, and his arrest was unlawful.

**COUNT IV
TRESPASS TO CHATTEL / CONVERSION (BOTELER AND UNIDENTIFIED MPD
DEFENDANTS)**

192. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

193. Defendant Boteler and the Unidentified MPD Defendants intentionally interfered with the Plaintiffs lawful possession of his camera.

194. Defendant Boteler and the Unidentified MPD dispossessed the Plaintiff of his tapes, DVDS, computers, photocopier, computer monitor, frames, and intellectual property in the form of his videos of police misconduct by destroying them.

195. Plaintiff has been deprived of the use of his tapes, DVDS, computers, photocopier, computer monitor, frames, and intellectual property in the form of his videos of police misconduct for a substantial period of time.

196. As a result of Defendants' trespass and conversion of Plaintiff's tapes, DVDS, computers, photocopier, computer monitor, frames, and intellectual property in the form of his videos of police misconduct, Plaintiff has sustained damages, including but not limited to compensatory damages, medical expenses, emotional distress, and attorney's fees.

COUNT V

TRESPASS TO CHATTEL / CONVERSION (BOTELER)

197. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

198. Defendant Boteler has intentionally interfered with the Plaintiff's lawful possession of his cigar.

199. Defendant Boteler has dispossessed the Plaintiff of his cigar by taking it for Defendant Boteler's personal use.

200. Plaintiff has been deprived of the use of his cigar for a substantial period of time.

201. As a result of Defendant's trespass and conversion of Plaintiff's cigar, Plaintiff has sustained damages, including but not limited to compensatory damages, medical expenses, emotional distress, and attorney's fees.

COUNT VI
FOURTH AMENDMENT VIOLATIONS ON DECEMBER 30 (BOTELER AND
UNIDENTIFIED MPD DEFENDANTS)

202. The allegations of the foregoing paragraphs are incorporated as if realleged
* herein.

203. Fourth Amendment of the United States Constitution provides that people shall be
"secure in their persons, houses, papers, and effects, against unreasonable searches and seizures."
U.S. Const. amend. IV.

204. Defendant Boteler's and the Unidentified MPD Defendant's December 30, 2011
search of Plaintiff's house, is violations of Plaintiff's Fourth Amendment rights. In searching,
Plaintiff's house, Defendant Boteler and the Unidentified MPD Defendants exceeded their authority
permitted under law.

205. Defendant Boteler and the Unidentified MPD Defendants violated Plaintiff's
Amendment rights by searching his house. This search, which was conducted without a warrant, did
not fall into any Fourth Amendment exception and the Defendants' actions were intentional with
reckless indifference to Plaintiff's rights and sensibilities.

COUNT VII
MALICIOUS PROSECUTION (BOTELER)

206. The allegations of the foregoing paragraphs are incorporated as if realleged
herein.

207. Defendant Boteler caused Plaintiff to be charged in the Superior Court for the
District of Columbia with possession of methamphetamines even though she knew that no basis for
that charge existed.

208. Defendant Boteler caused the relevant and necessary documents to be filed for the
lodging of said criminal charge against Plaintiff.

209. This proceeding was initiated on the basis of false and misleading information and without probable cause.

210. Defendant Boteler knowingly and maliciously gave perjured testimony before the Superior Court for the District of Columbia in the criminal proceedings initiated against Plaintiff.

211. The criminal proceeding was terminated in favor of Plaintiff by a dismissal.

212. Defendant Boteler initiated the arrest of and criminal proceeding against the Plaintiff with malice and a purpose other than bringing Plaintiff to justice, namely in order to prevent Plaintiff from continuing to document crimes and misconduct by MPD officers.

213. As a direct and proximate result of the malicious prosecution of the Plaintiff, he suffered actual physical harm, including vomiting, weight loss, head trauma, sleeplessness, discomfort, distress; economic harm, including loss of income and medical expenses; loss of liberty; and has suffered, and will continue to suffer, psychological harm and mental anguish including severe anxiety, fright, shame, mortification, humiliation and embarrassment from the indignity and disgrace of being unlawfully arrested, taken into custody and grossly mistreated.

COUNT VIII

FALSE ARREST (BOTELER)

214. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

215. Defendant Boteler placed Plaintiff under arrest without a warrant and without probable cause.

216. At all times described herein, Defendant Boteler was engaged in the performance of his duties as an employee and/or agent of the District of Columbia, within the scope of his employment and/or agency and in furtherance of the interest of the District of Columbia.

217. At all times described herein, Officer Boteler was engaged in the performance of his duties as an employee and/or agent of the District of Columbia, within the scope of his employment and/or agency and in furtherance of the interest of the District of Columbia.

COUNT IX
MALICIOUS PROSECUTION (MAULFAIR)

218. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

219. Defendant Maulfair caused Plaintiff to be charged in the Superior Court for the District of Columbia with contempt of court even though she knew that no basis for that charge existed.

220. Defendant Maulfair caused the relevant and necessary documents to be filed for the lodging of said criminal charge against Plaintiff.

221. This proceeding was initiated on the basis of false and misleading information and without probable cause.

222. Defendant Maulfair knowingly and maliciously gave perjured testimony before the Superior Court for the District of Columbia in the criminal proceedings initiated against Plaintiff.

223. The criminal proceeding terminated in favor of Plaintiff by a dismissal.

224. Defendant Maulfair initiated the arrest of and criminal proceeding against the Plaintiff with malice and a purpose other than bringing Plaintiff to justice, namely in order to prevent Plaintiff from continuing to document crimes and misconduct by MPD officers.

225. As a direct and proximate result of the malicious prosecution of the Plaintiff, he suffered actual physical harm, including vomiting, weight loss, head trauma, sleeplessness, discomfort, distress; economic harm, including loss of income and medical expenses; loss of

liberty; and has suffered, and will continue to suffer, psychological harm and mental anguish including severe anxiety, fright, shame, mortification, humiliation and embarrassment from the indignity and disgrace of being unlawfully arrested, taken into custody and grossly mistreated.

COUNT X

FOURTH AMENDMENT VIOLATIONS ON JANUARY 4 (DEFENDANT CARRUTHERS, UNIDENTIFIED USMS AND UNIDENTIFIED MPD DEFENDANTS)

226. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

227. Fourth Amendment of the United States Constitution provides that people shall be "secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." U.S. Const. amend. IV.

228. Defendant Carruther's, Unidentified USMS Marshals' and the Unidentified MPD Defendant's January 4, search of Plaintiff's house, is a violation of Plaintiff's Fourth Amendment rights. In searching Plaintiff's house, Unidentified USMS Marshals and the Unidentified MPD Defendants exceeded their authority permitted under law.

229. Defendant Carruther and the Unidentified USMS Marshals and the Unidentified MPD Defendants violated Plaintiff's Amendment rights by searching his house. This search, which was conducted without a warrant, did not fall into any Fourth Amendment exception. The Defendants' actions were intentional with reckless indifference to Plaintiff's rights and sensibilities.

COUNT XI

**TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS
(BOTELER)**

230. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

231. At the time Defendant Boteler's illegal raids of 1708 began, Plaintiff enjoyed full occupancy of the rental units at 1708 and had never had a vacancy

232. With 1708's documented history of excellence as a well performing rental property, Plaintiff had every reason to believe he would retain his tenants at 1708 for as long as he chose. This belief was based on the property's performance.

233. Plaintiff had a significant probability of continued and significant future economic benefit from his tenants at 1708.

234. Defendant Boteler had knowledge of Plaintiff's relationship with his 1708 tenants.

235. Defendant Boteler employed improper means to interfere with Plaintiff's business expectancies and contractual relationships, including illegally raiding 1708 on multiple occasions, telling Plaintiff's tenant he would continue his disruptive illegal raid and telling Plaintiff's tenants to move out.

236. But for Defendant Boteler's improper means, as set forth in detail in this Complaint, Plaintiff would have enjoyed continued rental income from his tenants at 1708.

237. In injuring Plaintiff's reputation, illegally raiding 1708 on multiple occasions, telling Plaintiff's tenant he would continue his disruptive illegal raids and telling Plaintiff's tenants to move out, Defendant Boteler wrongfully, intentionally, and tortuously interfered with Plaintiff's then-existing business expectancies with his tenants at 1708.

238. As a direct and proximate result of the tortious interference, Plaintiff has suffered and will suffer in the future great damages, including loss of reputation, loss of income, lost career and business opportunities and advancement, other past pecuniary losses, emotional pain,

embarrassment, humiliation, inconvenience, mental anguish, stress, pain, suffering, loss of enjoyment of life and other nonpecuniary injury.

239. Because of Defendant Boteler's conduct as set forth above, Plaintiff is also entitled to punitive damages.

COUNT XII
TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS
(UNIDENTIFIED US MARSHAL DEFENDANT)

240. The allegations of the foregoing paragraphs are incorporated as if realleged herein.

241. At the time of the Unidentified US Marshal Defendant's illegal raid of 35, Plaintiff enjoyed full occupancy of the rental units at 35 and had never had a vacancy

242. With 35's documented history of performance excellence as a well performing rental property, Plaintiff had every reason to believe he would retain his tenants at 35 for as long as he chose. This belief was based on the property's performance.

243. As part of Plaintiff's lease with his tenants at 35, Plaintiff possessed a contractual relationship and expectancy with his tenants at 35.

244. Plaintiff had a significant probability of continued and significant future economic benefit from his tenants at 35.

245. The Unidentified US Marshal Defendant had knowledge of Plaintiff's relationship with his tenants at 35.

246. The Unidentified US Marshal Defendant employed improper means to interfere with Plaintiff's business expectancies and contractual relationships, including illegally raiding 35, telling Plaintiff's tenant that Plaintiff was engaged in financial fraud and telling her to close the bank account she used to pay Plaintiff her rent.

247. But for the Unidentified US Marshal Defendant's improper means, as set forth in detail in this Complaint, Plaintiff would have enjoyed continued rental income from his tenants at 35.

248. In injuring Plaintiff's reputation, illegally raiding 35, and telling Plaintiff's tenant to close the bank account she used to pay Plaintiff rent, the Unidentified US Marshal Defendant wrongfully, intentionally, and tortiously interfered with Plaintiff's then-existing business expectancies and contractual relationships with his tenants at 35.

249. As a direct and proximate result of the tortious interference, Plaintiff has suffered and will suffer in the future great damages, including loss of reputation, loss of income, lost career and business opportunities and advancement, other past pecuniary losses, emotional pain, embarrassment, humiliation, inconvenience, mental anguish, stress, pain, suffering, loss of enjoyment of life and other nonpecuniary injury.

250. Because of the Unidentified US Marshal Defendant's conduct as set forth above, Plaintiff is also entitled to punitive damages.

COUNT XIII

TRESPASS ON JANUARY 4 (DEFENDANT CARRUTHERS, UNIDENTIFIED USMS AND UNIDENTIFIED MPD DEFENDANTS)

251. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

252. During all relevant times hereto, Plaintiff occupied his property with intent to control the manner of use and enjoyment thereof.

253. Defendants, by going on the third floor of 35, entered Plaintiff's property and failed to remove from the property after being told to leave and while under a duty to remove.

254. As a result of Defendant's trespass onto Plaintiff' land, Plaintiff has sustained damages, including but not limited to compensatory damages, medical expenses, emotional distress, and attorney's fees.

**COUNT XIII
DEPRIVATION OF CIVIL RIGHTS UNDER COLOR OF LAW (DISTRICT OF
COLUMBIA)**

255. Plaintiff brings this count under Title 42 of the United States Code, Section 1983.

256. At all times hereinafter mentioned, The Defendant, the District of Columbia, was a municipal corporation having the authority to sue and be sued.

257. The Defendant, The Department of Corrections (DOC), is an independent agency of the District of Columbia.

258. All the actions complained of herein were done by employees of the Department of Correction and taken under the color of law.

259. Between January 4 to on or about April 25 the Plaintiff was committed to the DOC on pretrial detention and placed under the care and the control of the DOC.

260. The Plaintiff while in the custody and care of the Department of Corrections, made several complaints to Correctional staff on duty regarding the pain in his tooth and made several requests to see a dentist, all of which were denied and/or ignored.

261. The Plaintiff made repeated requests to Defendant's employees/agents to see a dentist and to receive medical attention for his dental pain on a daily basis.

262. The Defendant's actions arise under the United States Constitution, particularly under the provisions of the Fifth and Fourteenth Amendments to the Constitution of the United States, and under federal law, Title 42 of the United States Code, Section 1983, in that the Defendant denied the Plaintiff his due process.

263. The Defendant, the District of Columbia, exhibited actions with deliberate indifference to the care and concern of the defendant and like persons in their care in that the Defendant prevented the Plaintiff from otherwise obtaining the needed medical treatment.

264. The Defendant's actions violated the Plaintiff's Fourteenth Amendment protection against deprivation of liberty without due process.

265. The Defendant's lack of concern and failure to provide the Plaintiff medical attention caused the Plaintiff to suffer further injury to his tooth thereby causing Plaintiff's tooth to fall out.

266. The Defendant's deliberate indifference to provide care and attention to the Plaintiff's dental condition caused or contributed to the Plaintiff's falling out while he was incarcerated.

267. The right of Plaintiff not to be deprived of life, liberty or property without due process of law, and the right to the equal protection of the laws, secured by the Fifth and Fourteenth Amendments to the U.S. Constitution were violated by Defendants.

COUNT XIII
DELIBERATE INDIFFERENCE TO PAST, CURRENT, AND ONGOING
UNCONSTITUTIONAL CONDITIONS AT DOC (DISTRICT OF COLUMBIA)

268. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

269. Defendants have subjected Plaintiff who was detained in the DOC as a pretrial detainee to cruel and inhumane prison conditions that damaged him and which posed an unreasonable and unjustifiable risk of harm to his health, and have manifested and continue to manifest a pattern of deliberate indifference to this damage and risk of harm. The challenged

conditions violate the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

**COUNT XIV
BATTERY (ALFRED "BLACK MAMBA" HAYES)**

270. Plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

271. Defendant Alfred "Black Mamba" Hayes grabbed and threw Plaintiff without cause or justification.

272. Defendant Alfred "Black Mamba" Hayes forced Plaintiff to strip naked, wrenched his arm, and threw him against a door without cause or justification.

273. Defendant Alfred "Black Mamba" Hayes's actions were malicious and intentional.

274. Defendant Alfred "Black Mamba" Hayes' conduct caused offensive contact to Plaintiff.

275. As a direct and proximate result of Defendant Alfred "Black Mamba" Hayes' use of excessive and unreasonable force, Plaintiff suffered severe physical and substantial economic damages, including but not limited to, tremendous pain and suffering; physical, mental and emotional distress; embarrassment and humiliation, permanent injury; severe anxiety; past and future expenses for hospital and/or medical care, rehabilitation, and or therapy.

**COUNT XV
LIBEL PER SE (JIN PARK)**

276. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

277. The oral statements by Defendant Park accusing Plaintiff of doing "very, very bad things" are defamatory per se and tend to injure Plaintiff in his profession because they falsely impute to Plaintiff deceit, as well as the commission of criminal offenses, in a manner injurious to the reputation and esteem of Plaintiff professionally, locally, nationally, and globally.

278. The aforementioned statements proximately caused Plaintiff damages in the form of injury to his reputation and emotional distress.

279. The aforementioned statements are false, and were false when made. Defendant Park knew or should have known the statements were false when made.

280. Defendant made the aforementioned statements with actual malice and wrongful and willful intent to injure Plaintiff. The statements were made with reckless disregard for their truth or falsity or with knowledge of their falsity and with wanton and willful disregard of the reputation and rights of Plaintiff.

281. The aforementioned statements were made of and concerning Plaintiff, and were so understood by those who read defendants' publications of them.

282. Defendant Park knew or should have known that the statements were injurious to Plaintiff's career, business and reputation.

283. As a proximate result of the aforementioned statements Plaintiff has suffered and continues to suffer damages in an amount to be determined at trial.

284. The aforementioned statements were made by Defendant Park with actual malice and either with knowledge of their falsity or in reckless disregard of the truth or falsity of the statements.

285. In making the defamatory statements, Defendant acted intentionally, maliciously, willfully and with the intent to injure Plaintiff, or to benefit defendant. Defendant Park is liable to Plaintiff for punitive damages in an amount in accordance with proof at trial.

COUNT XVI
LIBEL PER SE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692 ET SEC (GEORGE WASHINGTON HOSPITAL CENTER)

286. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

287. Plaintiff is a "consumer" as defined in 15 U.S.C. § 1692a(3).

288. Defendant George Washington University Hospital is a "creditor" as defined in 15 U.S.C. § 1692a(4).

289. Defendant George Washington University Hospital is a "debt collector" as defined in 15 U.S.C. § 1692a(6).

290. The alleged amount owed to Defendant is a "debt" as defined in 15 U.S.C.

291. Defendant George Washington University Hospital violated 15 U.S.C. § 1692e(2) & (8) by filing delinquent credit ratings

292. Defendant George Washington University Hospital violated 15 U.S.C. § 1692e(2) & (8) by pursuing Plaintiff for a debt which was not owed the Defendant.

293. That as a result of Defendant George Washington University Hospital's wrongful conduct as set forth above, Plaintiff has incurred general damages to be determined at trial, and attorney's fees and costs.

COUNT XVI
LIBEL PER SE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692 ET SEC (HOWARD UNIVERSITY HOSPITAL)

294. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

295. Plaintiff is a "consumer" as defined in 15 U.S.C. §1692a(3).

296. Defendant Howard University Hospital is a "creditor" as defined in 15 U.S.C. § 1692a(4).

297. Defendant Howard University Hospital is a "debt collector" as defined in 15 U.S.C. § 1692a(6).

298. The alleged amount owed to Defendant is a "debt" as defined in 15 U.S.C.

299. Defendant Howard University Hospital violated 15 U.S.C. § 1692e(2) &(8) by filing delinquent credit ratings

300. Defendant Howard University Hospital violated 15 U.S.C. § 1692e(2) &(8) by pursuing Plaintiff for a debt which was not owed the Defendant.

301. That as a result of Defendant George Washington University Hospital's wrongful conduct as set forth above, Plaintiff has incurred general damages to be determined at trial, and attorney's fees and costs.

COUNT XVI
LIBEL PER SE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. §1692 ET SEC (WASHINGTON HOSPITAL CENTER)

302. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

303. Plaintiff is a "consumer" as defined in 15 U.S.C. §1692a(3).

304. Defendant Washington Hospital Center is a "creditor" as defined in 15 U.S.C. § 1692a(4).

305. Defendant Washington Hospital Center is a "debt collector" as defined in 15 U.S.C. § 1692a(6).

306. The alleged amount owed to Defendant is a "debt" as defined in 15 U.S.C.

307. Defendant Washington Hospital Center violated 15 U.S.C. § 1692e(2) &(8) by filing delinquent credit ratings

308. Defendant Washington Hospital Center violated 15 U.S.C. § 1692e(2) &(8) by pursuing Plaintiff for a debt which was not owed the Defendant.

309. That as a result of Defendant George Washington University Hospital's wrongful conduct as set forth above, Plaintiff has incurred general damages to be determined at trial, and attorney's fees and costs.

COUNT XVII
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (ALL DEFENDANTS
EXCEPT HOSPITAL DEFENDANTS)

310. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

311. The Defendants exhibited extreme and outrageous conduct toward Plaintiff.

312. The Defendants intentionally or recklessly caused Plaintiff to undergo severe emotional distress, including, but not limited to, fear, anxiety, stress, embarrassment, humiliation, and mental anguish.

COUNT XVIII
CIVIL CONSPIRACY (DEFENDANTS BOTELER, GREEN-WILLIAMS, MITCHELL,
WINGATE, TAYLOR, MANLAPAZ, AND DEVALERA)

313. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

314. Upon information and belief, in or around September, Defendants entered into an agreement to commit an illegal act of obstruction of justice.

315. Upon information and belief, Defendants did indeed commit obstruction of justice by concealing evidence of and refusing to investigate crimes against Plaintiff by MPD officers, Correctional Officers, and others.

316. Upon information and belief, Defendants authorized, instigated, condoned and/or participated in the conspiracy to commit obstruction of justice.

317. As a result of said obstruction, Plaintiff became sick, sore, lame and disabled, received severe and serious injuries in and about diverse parts of his person and suffered loss of enjoyment of life, distress, mental shock, mental anguish and psychological trauma and was otherwise injured and will remain injured for a considerable length of time.

318. That by reason of the foregoing, Plaintiff was compelled to and did necessarily require medical aid and attention, and Plaintiff did necessarily and become liable thereof for medical aid and Plaintiff will necessarily continue to incur similar expenses.

319. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

**COUNT XIX
NEGLIGENT HIRING AND RETENTION OF DEFENDANT MAULFAIR (DISTRICT
OF COLUMBIA)**

320. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

321. Upon information and belief, the aforesaid malicious prosecution and intentional infliction of emotional distress was committed in furtherance of the business of Defendant District of Columbia.

322. Upon information and belief, by hiring and retaining the aforesaid employees' Anita Maulfair, Defendant District of Columbia should have known that Defendant Maulfair was

unfit for the employment for which hired, and was negligent in the hiring and supervision of Defendant Maulfair.

323. Upon information and belief, by hiring and retaining the aforesaid employees, Defendant District of Columbia herein created and propitiated a situation where it was likely that the aforesaid employee would maliciously prosecute and commit intentional infliction of emotional distress on others.

324. Upon information and belief, Defendant District of Columbia authorized, instigated, participated in and/or condoned the malicious prosecution and intentional infliction of emotional distress of Plaintiff.

325. Upon information and belief, the Defendant District of Columbia, knew or should have known in the exercise of due and reasonable care that the aforesaid employees were vicious and potentially dangerous.

326. As a result of said negligence, Plaintiff was maliciously prosecuted, became sick, sore, lame and disabled, received severe and serious injuries in and about diverse parts of his person and suffered great physical pain, loss of enjoyment of life, distress, mental shock, mental anguish and psychological trauma and was otherwise injured and will remain injured for a considerable length of time.

327. That by reason of the foregoing, Plaintiff was compelled to and did necessarily require medical aid and attention, and Plaintiff did necessarily become liable thereof for medical aid and Plaintiff will necessarily continue to incur similar expenses.

COUNT XX
FIFTH AMENDMENT TAKING OF PROPERTY WITHOUT DUE PROCESS
(DEFENDANTS GREEN-WILLIAMS AND THE CRIME VICTIMS COMPENSATION
FUND)

328. The plaintiff incorporates the allegations in the preceding paragraphs as if fully set forth herein.

329. Defendants Green-Williams and the Crime Victims Compensation Fund have deprived Plaintiff of the ability to file a claim with the Crime Victims Compensation Fund by refusing to process Plaintiff claims, ignoring the rules governing the CVCP promulgated by the Superior Court of the District of Columbia specifically Superior Court Rule-Crime Victims Comp. Program Rule 17 requiring the CVCP to issue a "Notice of Determination" and by refusing to accept the reasonable documentation of Plaintiff's claim submitted by Plaintiff.

330. Defendants have eliminated Plaintiff's ability to obtain funds from the CVCP. Defendants have deprived Plaintiff of his property interest in his existing and potential claims to the CVCP without due process of law.

331. As a result of these actions, PLAINTIFF has suffered economic damages.

COUNT XXI
NEGLIGENCE PER SE (MPD AND DOC DEFENDANTS AND THE DISTRICT OF COLUMBIA)

332. By executing repeated illegal searches of Plaintiff's building, harassing Plaintiff, and failing to maintain the DOC in a safe and sanitary manner Defendants were negligent. As a consequence of this per se negligence, defendants are liable for damages to plaintiff.

COUNT XXII
RESPONDEAR SUPERIOR (DISTRICT OF COLUMBIA)

333. Defendant District of Columbia is liable for the common law torts of its employees committed in the scope of their employment. Where any officer is found liable to plaintiffs for Claims in this complaint (Assault and Battery, False Arrest, Trespass to Chattels and Conversion, Negligence Per Se, Intentional Infliction of Emotional Distress, and Negligent Infliction of Emotional Distress), the District of Columbia is also liable under the doctrine of respondeat superior.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that the Court:

- (a) ENTER JUDGMENT holding the appropriate defendants jointly and severally liable to the plaintiffs for compensatory damages in an amount appropriate to the proof adduced at trial;
- (b) ENTER JUDGMENT holding the appropriate defendants jointly and severally liable to the plaintiffs for punitive damages in an amount appropriate to the proof adduced at trial;
- (c) AWARD to plaintiffs their costs and reasonable attorneys' fees; and
- (d) GRANT such other and further relief as the Court deems just and proper.

VII. JURY DEMAND

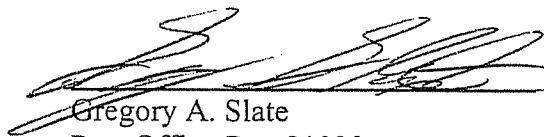
Plaintiff hereby demands a trial by jury on all issues.

Dated This 10th Day of December, 2014

_____ Dated This 10th Day of April, 2014

Respectfully Submitted,

GREGORY A. SLATE
Pro Se



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10 April 2014
Brian H. Price

