

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

EVELYN PARHAM

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Washington, D.C. 20019

NICHOLE JONES

1910 Massachusetts Ave. SE
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CARLOTTA MITCHELL

4600 Martin Luther King Jr. Ave SW, Apt.
C512
Washington, D.C. 20032

DOMINIQUE ROBERTS

1200 G St. NE
Washington, D.C. 20002

and

VICTOR HALL

1224 Canal St. SW
Washington, D.C. 20024

Plaintiffs,

v.

DISTRICT OF COLUMBIA

GABRIEL ROBINSON, Director of the
District of Columbia Department of Motor
Vehicles, in his official capacity

and

GLEN LEE, Chief Financial Officer for the
District of Columbia, in his official capacity

Defendants.

Case No.:

COMPLAINT

Plaintiffs Evelyn Parham, Nichole Jones, Carlotta Mitchell, Dominique Roberts, and Victor Hall bring this complaint against Defendants District of Columbia, Gabriel Robinson, and Glen Lee, and allege as follows:

INTRODUCTION

1. For more than two decades, the District of Columbia (“the District” or “DC”) has operated a wealth-based driver’s license scheme that perpetuates the poverty of its poorest residents. The District enforces this scheme under what is known as the “Clean Hands Law,” D.C. Code § 47-2861, *et seq.* That law disqualifies Plaintiffs and thousands of DC residents in poverty from obtaining or renewing a driver’s license as punishment for owing the District more than \$100 in parking, traffic, or other fines or fees. Disqualification is automatic: in disallowing Plaintiffs and others who owe more than \$100 from obtaining or renewing a driver’s license, the Clean Hands Law provides for no inquiry into the drivers’ ability to pay and requires no determination that the failure to pay is willful.

2. For DC residents who can afford to pay their parking and traffic tickets, the Clean Hands Law is inconsequential. These residents typically enter a credit card account number into an online payment portal established by the District, obtain a receipt of payment, and then move on with their lives.

3. For DC residents who cannot afford to pay their parking and traffic tickets, the impact of the Clean Hands Law is severe and often life-altering. Without a driver’s license, Plaintiffs and other DC residents of limited means struggle with essential daily activities, including purchasing food at the grocery store, attending medical appointments, transporting children to childcare, visiting and caring for elderly relatives, and finding and keeping employment. The Clean

Hands Law not only punishes DC residents for their poverty, but intensifies the instability of their everyday lives.

4. The Clean Hands Law also exacts substantial societal costs. Because the harms inflicted by the Clean Hands Law fall disproportionately on Black DC residents, the law exacerbates racial inequalities. The Clean Hands Law also disrupts the workforce, harming both workers and employers. It needlessly exposes individuals to criminal punishment, again with a disproportionate impact on Black DC residents. And it diverts finite public safety resources from addressing violent crime.

5. Even with all the damage it does, the Clean Hands Law does not achieve its intended purpose of compelling people to pay their debts to generate revenue for the District. The vast majority of unpaid parking and traffic fines—about 85%—are owed by non-DC residents, most from Virginia and Maryland. The threat of non-renewal of a DC driver's license under the Clean Hands Law does not affect them. This threat also has no coercive effect on DC residents who can afford to pay their parking and traffic fines, as they have numerous other reasons to do so. Nor is the threat effective against DC residents who are too poor to pay. These residents cannot come up with money they simply do not have. Indeed, for Plaintiffs and other DC residents of limited means, enforcement of the Clean Hands Law *undermines* the District's payment-coercion objective: by automatically disqualifying these residents from driving, the statute makes it harder for them to find or keep a job and thus diminishes the likelihood they will be able to pay their debts.

6. The District's enforcement of the Clean Hands Law violates Plaintiffs' rights under Fifth Amendment to the Constitution in four ways. *First*, it violates procedural due process by providing Plaintiffs no hearing at all prior to (or after) depriving them of their constitutionally

protected property interest in a driver's license. *Second*, enforcement of the Clean Hands Law violates the Fifth Amendment at the "convergence" of its due process and equal protection guarantees by depriving Plaintiffs of their driver's licenses without any inquiry into their ability to pay fines and fees and, thus, without any determination that the failure to pay is willful rather than a consequence of their poverty. *Third*, enforcement of the Clean Hands Law violates equal protection guarantees because it disqualifies Plaintiffs from obtaining or renewing a driver's license as a penalty for owing money to the District, while District law does not impose an equally harsh penalty on DC residents unable to satisfy civil money judgments to private parties. *Fourth*, enforcement of the Clean Hands Law violates substantive due process because depriving Plaintiffs of the ability to obtain or renew a driver's license based on the nonpayment of parking and traffic debts does not achieve, cannot plausibly achieve, and thus is not rationally related to the statute's objective of coercing them to pay their debts to generate revenue for the District.

7. Because the District's enforcement of the Clean Hands Law violates these Fifth Amendment guarantees, Plaintiffs are entitled to both declaratory relief and an injunction barring enforcement of the law against them.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this action under D.C. Code § 11-921(a) and 42 U.S.C. § 1983.

9. Venue is proper in this Court because all parties reside in the District and because all wrongful conduct giving rise to this case occurred in, was directed to, or emanated from the District.

PARTIES

10. **Plaintiff Evelyn Parham** is a 51 year-old Black Ward 7 District resident who has been automatically disqualified from renewing a DC driver's license because of unpaid parking and traffic tickets and related fines and fees that, income permitting, she would pay but is currently unable to afford to pay.

11. On December 20, 2016, Ms. Parham was in a car accident in Northeast DC after she drove over a pothole on the Benning Road Bridge. All of her tickets stem from this accident.

12. On the day of the accident, Ms. Parham had to pay for her car to be towed. The very next day, December 21, she contacted the District's 311 number and requested compensation for the damage to her car. Ms. Parham was given a claim number and told that a reimbursement form would be sent to her in the mail. The delivery of that form, however, was severely delayed. Ms. Parham had to call the District's Office of Risk Management on three separate occasions in January and February 2017 to obtain it.

13. Ms. Parham finally received the required reimbursement form in February 2017, nearly two months after her accident. Because of heavy snow that winter, Ms. Parham had trouble getting a mechanic to inspect and photograph her car, as required by the form. When Ms. Parham submitted a completed form in mid-June 2017, the District government informed her that it would not pay for the damage to her car because she had waited too long to submit the form. Ms. Parham later learned that under DC law, she had to submit her claim by June 18, 2017, and that the District rejected her reimbursement request because it was submitted three days late.

14. Given the damage to Ms. Parham's car from the accident and Ms. Parham's inability to pay for towing, the car continued to sit idle outside of her home. Ms. Parham's car's inspection certificate expired on June 3, 2017. Her registration expired on June 4, 2017. Worried that her car would be ticketed, Ms. Parham contacted staff at the Office of the Mayor. Staff

informed her that her case would be noted, and her car would not be ticketed. Despite this, Ms. Parham's car was ticketed for expired tags and inspection as it sat outside of her house. The following month, July 2017, Ms. Parham's car was ticketed twice more. Ms. Parham was given assurances by the Metropolitan Police Department that her car would not be further ticketed and that it would not be towed. However, in November 2017, Ms. Parham's car was towed.

15. Ms. Parham appealed these tickets, and the fact that her car was towed, to the Department of Motor Vehicles ("DMV") Adjudication Services Office. Her appeals were rejected.

16. On April 22, 2019, Ms. Parham's driver's license expired. Under the Clean Hands Law, she is automatically disqualified from renewing it due to her outstanding debt of over \$100 to the District.

17. The DMV has informed Ms. Parham that she cannot renew her driver's license until she pays \$800 in outstanding debt, as well as a \$120 reinstatement fee and a \$44 license registration fee.

18. Ms. Parham can no longer work, and so does not have employment income. She currently receives \$771 a month in SSI assistance and \$238 a month in food stamp benefits. After paying for the necessities of daily living, she does not have enough money left to pay her outstanding fines and fees.

19. Not having a license makes it more difficult for Ms. Parham to care for her elderly mother, who is disabled and lives with her. Because Ms. Parham cannot drive, she must spend precious funds to pay for others to pick up her mother and transport her to her medical appointments. Additionally, Ms. Parham must seek transportation to run her personal errands, including picking up her own medications.

20. **Plaintiff Nichole Jones** is a 48 year-old Black Ward 8 District resident who has been automatically disqualified from renewing a DC driver's license because of unpaid parking and traffic tickets and related fines and fees that, income permitting, she would pay but is currently unable to afford to pay.

21. Ms. Jones currently lives at the Harriet Tubman Women's Shelter in Southeast DC.

22. Ms. Jones is a graduate from the University of the District of Columbia. She previously had a career in public service.

23. In 2008, Ms. Jones was seriously injured. Since then, she has been unable to work, and her financial situation, already stressed from student loans, deteriorated further.

24. Over time, Ms. Jones accumulated \$2,884 in tickets. Initially, she had tickets for parking and minor moving violations. When these tickets remained unpaid, her license was suspended without her knowledge. In 2014, Ms. Jones was arrested and received additional tickets for driving on a suspended license. Ms. Jones later incurred additional fines when two checks she wrote to pay off her debt bounced due to insufficient funds.

25. Ms. Jones presently has no income and receives no government assistance. She cannot afford to pay her outstanding debt to the District and thus cannot renew her driver's license.

26. Without a driver's license, Ms. Jones must walk to get from place to place to the extent she can. She now has limited mobility because she has developed a muscular cyst on her left foot as a result of constant walking.

27. With a driver's license, Ms. Jones could earn income driving for a rideshare service like Lyft or Uber. She could also pursue resuming work in an office job. Without a license, neither is possible.

28. **Plaintiff Carlotta Mitchell** is a 70 year-old Black Ward 8 District resident who has been automatically disqualified from renewing a DC driver's license because of unpaid parking tickets and related fines and fees that, income permitting, she would pay but is currently unable to afford to pay.

29. Ms. Mitchell is a college graduate who has worked as an elementary school teacher, a civil servant, and a business consultant.

30. In 2009, Ms. Mitchell became unemployed and eventually became homeless. She stayed periodically at the John L. Young Women's Shelter, the Nativity Shelter for Women, and the Open Door Shelter. Often, however, Ms. Mitchell slept in her car with her therapy dog. During this period, Ms. Mitchell's car's registration expired, and she could not afford to renew it.

31. As a result of parking tickets accumulated between 2012 and 2014, Ms. Mitchell owes \$660 in debt to the District. All of her parking tickets arose from the expiration of her vehicle's tags during her period of homelessness and residence in shelters. None of her outstanding tickets are for speeding or other moving violations.

32. Ms. Mitchell remains unemployed. She has no pension. She currently receives \$970 per month in Social Security, \$40 a month in DC's Low Income Home Energy Assistance Program, and \$200 a month in food stamps benefits, a sum which will be reduced when pandemic relief expires. Ms. Mitchell uses this money to feed and clothe herself and pay for other necessities. She does not have disposable income to pay off her outstanding parking fines and fees so that she can renew her driver's license.

33. There are few grocery stores in Ms. Mitchell's neighborhood. Without a driver's license, Ms. Mitchell must rely on taxis, rideshare companies and, when feasible, Metro services, to shop for food.

34. **Plaintiff Dominique Roberts** is a 35 year-old Black Ward 6 District resident who has been automatically disqualified from obtaining a DC driver's license because of unpaid parking and traffic tickets and related fines and fees that, income permitting, she would promptly pay, but that she is unable to afford to pay.

35. Ms. Roberts works as a nurse in the Intensive Care Unit at Washington Hospital Center.

36. Currently, Ms. Roberts owes the District \$1,200 in fines and fees. This debt stems from four tickets: two for parking and two for minor moving violations where Ms. Roberts was driving between eleven and twenty miles over the speed limit.

37. Ms. Roberts' driver's license expired in September 2019. Because of her outstanding debt to the District, the Clean Hands Law has prevented her from renewing her license.

38. Although she is currently paying off her debt little by little, Ms. Roberts cannot do so all at once, and so remains barred from obtaining a new driver's license. She is gainfully employed, but she is raising three school-age daughters and cares for her aging mother, who lives with them. Ms. Roberts receives no child support to aid her in raising her children.

39. Without the ability to drive, Ms. Roberts struggles to raise her three daughters and care for her mother. Her youngest child is unable to participate in many extracurricular activities because Ms. Roberts cannot drive her.

40. The renewal of a nursing license, like the renewal of other professional licenses and driver's licenses, is subject to the Clean Hands Law. While Ms. Roberts presently has a nursing license, she is concerned that, if left unpaid, her outstanding fines and fees will disqualify her from renewing that license when it expires in June 2023, and she will lose her job as a result.

41. **Plaintiff Victor Hall** is a 59 year-old Black Ward 6 DC resident who has been automatically disqualified from obtaining a DC driver's license because of unpaid parking and traffic tickets and related fines and fees that, income permitting, he would promptly pay, but is unable to afford to pay.

42. Mr. Hall was born and raised in the District.

43. For 14 years, Mr. Hall served both as a reservist with the D.C. National Guard and in active duty as a sergeant with the Army.

44. Mr. Hall has a certificate in heating, ventilation and air conditioning (HVAC) maintenance, and did HVAC maintenance and repair work in the DC metropolitan area for many years.

45. In April 2020, Mr. Hall was working at a local heating and air conditioning company. That month, he was seriously injured and has not worked since.

46. Mr. Hall receives regular physical therapy for his injuries at the VA Hospital and Washington Hospital Center. He currently has no income and no unemployment insurance.

47. According to the District of Columbia, Mr. Hall currently has over \$2,000 in unpaid fines and fees for tickets issued between 2010 and 2012. Two of these tickets are for parking violations. One is for driving through a red light. The other two are speed camera tickets that were issued when his vehicle was being driven by someone else.

48. In 2021, Mr. Hall received a letter from a collection agency representing the District that offered to resolve his debt for \$999. At that time, Mr. Hall was unable to pay this amount and remains unable to pay this amount.

49. Mr. Hall faces daily hardships because, due to the Clean Hands Law, he cannot legally drive. He must rely on friends or expensive rideshare services for rides to his medical and

physical therapy appointments, each of which he has twice a week, and to visit family members. Despite being unable to drive lawfully, Mr. Hall is prepared to drive his car to fulfill the necessities of daily life when he cannot get a ride.

50. If Mr. Hall had a driver's license, he would be far more capable of visiting family, attending his appointments consistently, and looking for a job.

51. **Defendant District of Columbia** is a municipal corporation that may be sued under D.C. Code § 1-102 for the acts and omissions of its agents, including agencies such as the Department of Motor Vehicles ("DMV") and the Office of the Chief Financial Officer ("OCFO"). Through the DMV and OCFO, the District enforces the Clean Hands Law.

52. **Defendant Gabriel Robinson** is the Director of the DMV. Director Robinson is sued in his official capacity. At all times relevant to the events, acts, or omissions alleged in this Complaint, Director Robinson has acted pursuant to his authority as an official of the District. As Director of the DMV, Defendant Robinson oversees the issuance, renewal, suspension, and revocation of driver's licenses. Under Defendant Robinson, the DMV enforces the Clean Hands Law as follows: (1) when a DC resident applies to the DMV to obtain or renew a driver's license, the DMV automatically cross-checks electronically stored records from OCFO to determine if the individual owes more than \$100 in fines or fees to the District; and (2) if OCFO's records indicate the individual owes more than \$100, the DMV automatically rejects the individual's application without inquiring into the individual's ability to pay the outstanding debt and without determining that the failure to pay is willful and not a consequence of the individual's poverty.

53. **Defendant Glen Lee** is the Chief Financial Officer for the District of Columbia, and the head of OCFO. Mr. Lee is sued in his official capacity. At all times relevant to the events, acts, or omissions alleged in this Complaint, Defendant Lee has acted pursuant to his authority as

an official of the District. As Chief Financial Officer, Defendant Lee oversees the collection of all fines and fees to the District. Under Defendant Lee, OCFO enforces the Clean Hands Law as follows: (1) OCFO maintains up-to-date records of all individuals owing more than \$100 in fines or fees to the District; (2) OCFO maintains an interagency electronic database enabling other District agencies to automatically access these records; and (3) through this database, OCFO furnishes these records to the DMV, which in turn relies on these records to automatically deny driver's licenses to DC residents who owe more than \$100 in fees or fees to the District.

FACTS RELEVANT TO ALL COUNTS

A. The Establishment of DC's Wealth-Based Driver's License Scheme under the Clean Hands Law

54. The DC Council passed the original Clean Hands Law in 1996. As enacted, the statute required denial of an application to obtain or renew a driver's licenses and other permits for non-payment of fines and taxes for littering, illegal dumping, and civil infractions assessed by the Department of Consumer and Regulatory Affairs.¹

55. The DC Council amended and significantly expanded the scope of the Clean Hands Law in 2001 to add parking and moving infractions to the list of violations that trigger penalties. Under then-amended provisions of the D.C. Code, any DC resident who accumulated more than

¹ See Clean Hands Before Receiving a License or Permit Act of 1996, D.C. Law 11-118, § 3(a), 43 D.C. Reg. 1191 (codified at D.C. CODE § 47-2862(a)(1)), code.dccouncil.us/dc/council/laws/docs/11-118.pdf); see also Report on an Amendment in the Nature of a Substitute to Bill 11-260, the "Clean Hands Before Receiving a License or Permit Act of 1995," COUNCIL OF THE DIST. OF COLUMBIA, COMM. ON PUB. WORKS AND THE ENV'T, 1-2, 16 (Sept. 20, 1995), lims.dccouncil.us/downloads/LIMS/4245/Committee_Report/B11-0260-CommitteeReport1.pdf.

\$100 of parking or traffic debt to the District automatically had an existing driver's license suspended and was automatically disqualified from obtaining or renewing a driver's license.²

56. The Council's stated purpose in enacting the 2001 amendment was to compel people to pay their outstanding fines and fees to generate additional revenue for the District. The Council report accompanying the amendment emphasized that 570,000 tickets dating back to 1979 and worth about \$53 million remained outstanding because DC motorists lacked a "compelling reason to respond to the notices of violations." The report concluded that one way to address this backlog was to "condition[] the issuance of any District license or permit on the payment of outstanding fines owed to the District," including fines for parking and traffic violations. Further underscoring the revenue-generation objective of the 2001 amendment, the District was at the time working hard to prove its fiscal responsibility to end the reign of the Financial Control Board and return to greater self-government. Congress had established the Board in 1995 in response to the District's budget crisis.

57. In 2018 and early 2019, acknowledging the harm that the loss of a driver's license for unpaid tickets inflicted on indigent DC residents, the Council ended the automatic suspension of driver's licenses based on non-payment of parking and traffic debt and certain civil court judgments, and required the DMV to restore all licenses suspended solely on those bases.³

² See Motor Vehicle and Safe Driving Amendment Act of 2000, D.C. Law 13-289, § 601, 48 D.C. Reg. 2057 (codified at D.C. CODE § 47-2862(a)(5)).

³ See Traffic and Parking Ticket Penalty Amendment Act of 2018, D.C. Law 22-175, § 2, 65 D.C. Reg. 9546 (enacted Sept. 6, 2018) (effective Oct. 30, 2018) (codified at D.C. CODE § 50-2302.08), lims.dccouncil.us/downloads/LIMS/37705/Signed_Act/B22-0204-SignedAct.pdf; see also Driver's License Revocation Fairness Amendment Act of 2018, D.C. Law 22-236, § 2, 66 D.C. Reg. 590 (enacted Jan. 15, 2019) (effective Mar. 13, 2019), lims.dccouncil.us/downloads/LIMS/39352/Signed_Act/B22-0618-SignedAct.pdf.

58. As a result of the 2018 and 2019 amendments, the DMV lifted the driver's license suspensions of more than 17,750 DC residents—more than 15,500 who owed debt to the District government and more than 2,250 with outstanding civil court judgments.

59. Although the non-renewal of a driver's license under the Clean Hands Law functions as a slow-motion suspension, the Council did not amend or reform the Clean Hands Law to eliminate its enforcement against DC residents who owe more than \$100 to the District at the time of renewal. Notwithstanding the elimination of the suspension provisions of the D.C. Code in 2018, the Clean Hands Law continues to automatically disqualify DC residents from renewing a driver's license, as well as obtaining one in the first place, if they owe more than \$100 in fines or fees.

60. The Clean Hands Law stands in contrast to District law governing civil money judgments owed by DC residents to private parties. Whereas the Clean Hands Law disqualifies DC residents who owe the District government more than \$100 from obtaining or renewing a driver's license, neither the Clean Hands Law nor any other District law imposes that penalty, or any equally harsh penalty, on DC residents required by court order to satisfy debts to private parties.

61. Under a prior provision of District law, one category of civil money judgment creditors—insurance companies—could register a judgment with the Mayor and petition the Mayor to suspend the judgment debtor's driver's license until the judgment was satisfied. However, as explained in Paragraph 57, the Council repealed this provision in 2019. It thus eliminated the only vestige of District law that treated civil money judgment debtors the same way the Clean Hands Law continues to treat those who owe more than \$100 to the District government.

B. The Operation of the Clean Hands Law

62. Since 2001, the Clean Hands Law has provided in relevant part: “Notwithstanding any other provision of law, the District government shall not issue or reissue a license or permit to any applicant for a license or permit if the applicant: (1) Owes the District more than \$100 in outstanding fines, penalties or interest assessed pursuant to the following [enumerated] acts . . . (2) Owes the District more than \$100 in past due taxes . . . ; [or] (7) Owes the District more than \$100 in outstanding fines, penalties, or interest[.]” D.C. Code § 47-2862(a).

63. By its plain language, the Clean Hands Law automatically disqualifies DC residents from obtaining or renewing a driver’s license (or any type of license or permit) if they owe more than \$100 in fines or fees to the District.

64. Under the Clean Hands Law, the District does not inquire into a DC resident’s ability to pay fines or fees of over \$100 before refusing to issue or renew a driver’s license. To the contrary, the refusal is automatic. DC residents too poor to pay their debts are disqualified from obtaining or renewing their driver’s licenses not because of any willful refusal to pay, but rather because of their poverty.

65. The District enforces the Clean Hands Law for driver’s licenses through the DMV and OCFO. When a DC resident applies to the DMV to obtain or renew a driver’s license, the DMV checks with a database maintained by the District’s Office of Tax and Revenue, within OCFO, to determine whether the resident owes more than \$100 in fines, fees, or other debt to the District. If the database reveals that the resident owes more than \$100, then the resident’s application transaction is automatically terminated, and the application is denied.

66. On information and belief, the District fails to maintain any record of how many driver’s license application transactions are canceled in this manner.

67. On information and belief, thousands of disqualified DC residents do not even attempt to obtain or renew a driver's license because of the Clean Hands Law.

68. Under the Clean Hands Law, the District has deprived DC residents of their driver's licenses unfairly, without notice, and in error. DC law entitles recipients of parking and traffic tickets to request reconsideration of their tickets and authorizes recipients to appeal an adverse decision. But DC residents often learn of their tickets only after the short deadlines for requests or appeals have passed. In some cases, DC residents who experience homelessness, or who move frequently for other reasons, remain unaware of tickets they have been issued for years, and may not learn of outstanding fines and fees until the District denies them a new or renewed driver's license under the Clean Hands Law. In other cases, District residents do not learn about their tickets until they receive notification by mail from debt collectors. And in yet other cases, DC residents sharing the same name as other drivers are wrongly identified as having parking or traffic debt, but do not learn of that debt—and the District's error—until the District denies them a new or renewed license under the Clean Hands Law.

69. It does not take much to accrue over \$100 in traffic or parking fines and fees in the District. That is especially true for DC residents who are financially unable to pay the originally imposed fine on time.

70. The District assesses fines for traffic and parking infractions in amounts typically ranging between \$50 and \$150. To take a few examples, a driver may be assessed a \$50 ticket for driving too slowly, 18 DCMR § 2200.10, 18 DCMR § 2600, a \$75 ticket for a broken taillight, 18 DCMR § 705.1, 18 DCMR § 2600, or a \$100 ticket for parking in a loading zone, 18 DCMR §§ 2402.6, 2601.1, tailgating, 18 DCMR §§ 2201.9, 2600, or turning right at a "no turn on red" sign. 18 DCMR §§ 2203, 2204, 2600.

71. Further, a driver may be assessed a \$100 ticket for driving between 11 and 15 miles per hour in excess of the speed limit. This is significant because the District deploys automated traffic enforcement (ATE) cameras throughout the city, including in neighborhoods with high concentrations of residents who are poor.

72. Failure to pay a ticket in 30 days, or 60 days for red light and speed camera tickets, results in a doubling of the fine amount. D.C. Code § 50-2302.05(d). Thus, even several \$25 parking tickets, when doubled, can quickly surpass the \$100 threshold.

73. For failure to pay in 90 days, the District's Department of Motor Vehicles typically sends the fine to a collection agency, which imposes an additional 20% surcharge.

74. The District does not inquire into a person's ability to pay before either doubling a fine or sending a fine to a collection agency and assessing the additional 20% surcharge.

75. This enforcement regime has a disproportionately harsh impact on DC residents with low or no income. Assume, for example, that DC Resident A and DC Resident B both receive a \$75 ticket for driving with a broken taillight. Resident A has adequate resources and pays the ticket without additional adverse consequences. Resident B, by contrast, lacks the resources to pay and the ability to obtain those resources in a short period, so the fine is doubled to \$150 after 30 days and, after 90 days, sent to collections and increased to \$180. In addition, under the Clean Hands Law, Resident B is disqualified from renewing their driver's license until the fine is paid, even though they do not have the ability to pay and may well continue to lack the ability to pay at the time of renewal. Thus, for the exact same violation, Resident A, who has the means to pay on time, will pay \$75, while Resident B, who lacks such means, will owe \$180 and will face a much higher barrier to renewing their driver's license. The only difference between these two individuals is Resident B's poverty.

C. The Harms the Clean Hands Law Inflicts on the District and Its Residents

76. Despite having received requests to do so, the District does not collect data on the number or demographics of DC residents who are currently unable to obtain or renew a driver's license under the Clean Hands Law. A conservative estimate is that tens of thousands of DC residents are currently disqualified. That rough estimate is based on the fact that, as of the most recently available public data from 2019, DC residents had 175,869 unpaid fines and fees of \$100 or more. Even assuming an average ratio of three fines per resident, 58,623 residents are disqualified from obtaining a driver's license—a figure representing over 10% of the District's adult population (575,161) based on the 2020 census.

77. The harms the Clean Hands Law inflicts on the thousands of DC residents who continue to be ensnared by the law are extensive. Without a driver's license, it is more difficult to navigate the activities of daily living. It is harder to get to the grocery store, take kids to and from childcare, visit and care for elderly relatives, attend doctors' appointments, and travel to and from—and thus hold—a job.

78. This is not only Plaintiffs' position. It is the position of the United States government. In a Statement of Interest arguing that Virginia's now-repealed version of the Clean Hands Law was unconstitutional, the Department of Justice stressed that the loss of a driver's license “can impose significant harm on the well-being of individuals. Depriving individuals of the use of their vehicle can imperil their ability to earn a living, pursue educational opportunities, and care for family.”

79. The harms Plaintiffs have suffered as a result of the Clean Hands Law, detailed above, are emblematic of the harms DC residents in poverty must endure when automatically deprived of driver's licenses under the Clean Hands Law. Evelyn Parham cannot properly provide

for her disabled mother. Nichole Jones is forced to walk far distances to meet her basic needs and has developed medical ailments. Carlotta Mitchell has had considerable difficulty visiting her family due to her inability to drive. Dominique Roberts struggles to take care of her mother and also her daughter, who, due to her disqualification from driving, is unable to participate in many extracurricular activities. Victor Hall has difficulty getting to his medical and physical therapy appointments. Other than Ms. Roberts, all Plaintiffs, despite having had jobs before, are currently unemployed and hindered by the Clean Hands Law from seeking, obtaining, and retaining new jobs.

80. Beyond making it more difficult for Plaintiffs and other DC residents of limited means to manage the necessities of daily life, the Clean Hands Law exacts significant societal costs.

81. The Clean Hands Law exacerbates racial inequality. Available data demonstrates that the harms inflicted by the Clean Hands Law fall disproportionately on Black DC residents. The median White DC household has 81 times more wealth than the median Black DC household, while Black drivers in DC are nearly four times more likely than White drivers to receive traffic tickets. The upshot is that Black DC residents are more likely to be ticketed than White residents, yet less likely to have the resources to pay the corresponding fines. Under the Clean Hands Law, Black DC residents are thus disproportionately more likely lose their ability to obtain or renew a driver's license.

82. The Clean Hands Law harms DC residents with disabilities, including several Plaintiffs in this case. In 2018, more than 60% of adults with disabilities reported that they drive a car. Yet adults with disabilities are more than twice as likely to experience poverty as adults without disabilities. Many disabled persons are on public assistance and have few assets, making

it difficult to save for a financial emergency. Individuals with disabilities are thus at increased risk of being ensnared by the Clean Hands Law. And the impact on them could be even harsher than for those without disabilities: while traveling a mile to a bus or Metro station may be feasible for an individual without disabilities, it is often infeasible for an individual with disabilities.

83. The Clean Hands Law harms workers. Without a valid driver's license, it is harder for DC residents to find and sustain employment outside the home. Only one in three jobs in the DC metro area is accessible by public transport within 90 minutes, fewer than one in five jobs are accessible within 60 minutes, and fewer than one in ten jobs is accessible within 45 minutes. By necessity, driving remains the most common way for workers to commute to their jobs in the DC metro area. That is particularly true for jobs that offer a pathway out of poverty, including jobs in construction, manufacturing, and security, as well as jobs that have proliferated during the COVID-19 pandemic, such as delivery and rideshare jobs, which plainly require a driver's license.

84. The Clean Hands Law harms employers. Without the means to reliably commute, an employee may not show up for work, and if an employee loses a job because they can no longer drive, their employer must hire and train a new employee and might have to pay unemployment insurance. In acknowledgment of such consequences, the U.S. Chamber of Commerce and major U.S. financial institutions have called for abolishing laws like the Clean Hands Law. For example, in a July 26, 2021 letter to Congress, CEOs for Racial Action sought to encourage reform, maintaining that, “[w]ithin businesses, debt-based license suspensions contribute to employee turnover, absenteeism, and increase recruiting”

85. The Clean Hands Law needlessly exposes DC residents to criminal punishment. In DC, driving without a valid driver's license is a criminal misdemeanor punishable by up to a year in jail and a fine of up to \$2,500. Yet because driving is vital for navigating daily life, many people

continue to drive without a license despite the risk of arrest and conviction. Indeed, of the nearly 30,000 arrests for traffic violations made by the DC Metropolitan Police Department between January 2013 and November 2020, driving without a license was the most serious offense the motorist was arrested for nearly 80% of the time—a staggeringly high rate, given that driving without a license is not inherently dangerous.

86. This burden, too, falls disproportionately on Black DC residents: 70% of DC residents arrested for driving without a license between January 2013 and November 2020 were Black men, even though Black men comprise less than 20% of DC’s adult population, and Black DC residents were 19 times more likely than White residents to be arrested for driving without a license.

87. By expanding the pool of residents at risk of arrest for driving without a valid license, the Clean Hands Law diverts the District’s finite public safety resources from addressing serious crime, including violent crime, as well as dangerous traffic offenses. In 2019 alone, DC Metropolitan Police Department officers made 2,797 adult arrests for which the most serious offense was driving without a license. An officer spent an average of 20 minutes to complete each traffic stop. Just completing the traffic stops in these cases consumed 932 hours (38.8 days) of police time. This figure excludes the substantial time officers spent on processing paperwork associated with the arrests.

D. The Failure of the Clean Hands Law to Achieve Its Intended Purpose

88. The harms the Clean Hands Law inflicts on DC residents in poverty by depriving them of driver’s licenses are not justified by the statute’s ostensible objective of generating revenue for the District from the payment of outstanding fines and fees.

89. There is no evidence that withholding a driver's license from someone too poor to pay their debts to the District will somehow incentivize them to come up with money they do not have.

90. In fact, the Clean Hands Law makes it more difficult for DC residents in poverty to come up with the money. Without a driver's license, DC residents in poverty will find it harder to maintain remunerative work. Without remunerative work, they cannot earn the income they need to pay what they owe and cannot otherwise flourish. The Clean Hands Law thus makes it harder, not easier, for the District to collect its debts from DC residents in poverty. As the United States Department of Justice has observed in the previously referenced Statement of Interest, “[A]utomatic driver's license suspensions do not further the [government]'s interest in ensuring compliance with court orders—particularly with respect to indigent defendants, who remain unable to pay court-ordered fines and fees after their driver's license suspension and may become less able to pay in light of the adverse impact of the suspension on their employment and their lives.”

91. The Clean Hands Law also does little or nothing to encourage payment from others who owe money to the District.

92. At least 85% of outstanding traffic and parking fines and penalties are owed by non-DC residents. These individuals do not have DC driver's licenses, so the threat of non-renewal of a DC driver's license under the Clean Hands Law does not incentivize them to pay their debts to the District.

93. DC residents who *can* afford to pay their debts to the District have strong incentives to pay apart from the Clean Hands Law's prohibition on driver's license renewal. These include not only the psychic benefits of paying off debt, but also (i) avoiding the hassle of dealing with

debt collection agencies; (ii) avoiding flags on credit reports and public records often checked by landlords and employers; (iii) avoiding the withholding of DC tax refunds; and (iv) retaining the ability to obtain professional and business licenses and permits requiring a Clean Hands certificate from the DC government.

94. The Clean Hands Law thus does not incentivize payment of parking and traffic debt by non-DC residents, who owe the vast majority of such debt, or by DC residents who can afford to pay such debt, and the statute makes it harder for DC residents who are too poor to pay, including Plaintiffs, to come up with the money to pay.

95. Policymakers, academic studies, and courts have recognized the inability of laws like the Clean Hands Law to accomplish their payment-coercion objective.

96. One study by the American Association of Motor Vehicle Administrators, a consortium of law enforcement agencies, concluded: “The common belief that a driver[’s] license suspension provides effective, sustainable motivation to encourage individuals to comply with court ordered or legislated mandates to avoid suspension is not supported by empirical evidence.”

97. In 2017, in a signing statement explaining his support for a reform of a California law that automatically suspended driver’s licenses for unpaid fines, then-Governor Jerry Brown observed: “There does not appear to be a strong connection between suspending someone’s driver[’]s license and collecting their fine or penalty. Often, the primary consequence of a driver[’]s license suspension is the inability to legally drive to work or take one’s children to school.”

98. The City of Dallas, Texas, like the District, uses a computer program that automatically places a hold on a driver’s license when someone fails to pay a fine or fee. The

neighboring City of Fort Worth, Texas does not use such a program. Yet Fort Worth collects more per case (\$116) than Dallas (\$113).

99. In a decision ruling that Virginia’s now-repealed law suspending driver’s licenses for unpaid debts was likely unconstitutional, the U.S. District Court for the Western District of Virginia found that the evidence it had received showed “[t]here is no indication that a loss of [a] license will incentivize individuals to pay court fines and costs where those individuals simply cannot afford to pay.” The Court continued: “In practice, the loss of a driver’s license adversely affects people’s ability to gain and maintain employment, often resulting in a reduction of income. This deprives individuals of means to pay their court debt, *hindering* the fiscal interests of the government.” *Stinnie v. Holcomb*, 355 F. Supp. 3d 514, 531 (W.D. Va. 2018) (emphasis added).

100. Laws like the Clean Hands Law are not only ineffectual and counterproductive, but also inferior to other methods of securing debt repayment from people of limited means. Empirical evidence suggests that tailoring debt from fines and fees to debtors’ ability to pay is more effective at obtaining repayment than punishing debtors for failing to pay a traditional, fixed amount.

101. For example, an Iowa county recently found that when it decreased civil fines by an average of \$40 based on ability to pay, the average amount collected jumped by more than \$160, from \$197 to \$360.

102. Similarly, a recent review of data in Maricopa County, Arizona found that, within a specified range for each offense, criminal defendants sentenced to fines adjusted for income paid nearly twice as much as defendants sentenced to traditional, non-income-adjusted fines. This was so even though the defendants sentenced to income-adjusted fines generally received lower fines. Moreover, the defendants sentenced to income-adjusted fines paid at least something toward their

finest at a rate 19% higher than the defendants sentenced to non-income-adjusted fines (96% vs. 77%) and were also far more likely to pay their fines in full within a year (52.7% vs. 20.3%).

CAUSES OF ACTION

COUNT I

Violation of Fifth Amendment Right to Procedural Due Process under 42 U.S.C. § 1983 (Against All Defendants)

103. Plaintiffs re-allege and incorporate by reference all of the foregoing paragraphs.

104. The procedural due process guarantee of the Fifth Amendment to the United States Constitution applies to the acts and omissions of the District and its officials.

105. This Fifth Amendment guarantee is enforceable against Defendants through 42 U.S.C. § 1983.

106. DC residents, including Plaintiffs, have a constitutionally protected property and liberty interest in retaining a driver's license.

107. Because Plaintiffs and other DC residents have a constitutionally protected interest in retaining a driver's license, the Due Process Clause of the Fifth Amendment requires Defendants to provide them with procedural due process before refusing to issue or renew a driver's license for them.

108. Procedural due process requires that, before disqualifying Plaintiffs and other DC residents from obtaining or renewing a driver's license for non-payment of debt to the District, Defendants must notify them of the existence of such debt, conduct an inquiry into their ability to pay such debt, provide them an opportunity to establish their inability to pay such debt, and determine that the non-payment of such debt is willful.

109. The Clean Hands Law provides none of these procedures. It automatically disqualifies Plaintiffs and other DC residents who owe the District more than \$100 from obtaining or renewing a driver's license—without establishing a process for inquiring into their ability to pay such debt, without providing residents an opportunity to prove their inability to pay to such debt, without requiring a determination that non-payment of such debt is willful, and sometimes without even notifying them of the existence of such debt in the first place.

110. Defendants' enforcement of the Clean Hands Law against Plaintiffs thus violates procedural due process.

111. As a result of Defendants' violation of Plaintiffs' procedural due process rights, Plaintiffs have suffered and continue to suffer harm, including but not limited to difficulty finding and maintaining employment, attending medical appointments, visiting and caring for family members, and fulfilling the other necessities of daily life.

COUNT II
Violation of Fifth Amendment Right to Due Process
and Equal Protection under 42 U.S.C. § 1983
(Against All Defendants)

112. Plaintiffs re-allege and incorporate by reference all of the foregoing paragraphs.

113. The due process and equal protection guarantees of the Fifth Amendment to the United States Constitution apply to the acts and omissions of the District and its officials.

114. DC residents, including Plaintiffs, have a right, located at the convergence of the Fifth Amendment's due process and equal protection guarantees, not to be punished by Defendants because of their poverty.

115. The Fifth Amendment thus bars Defendants from depriving Plaintiffs and other DC residents of their driver's licenses because of their debts without inquiring into their ability to

satisfy those debts and thus without determining that the nonpayment of those debts is willful and not because of their poverty.

116. This Fifth Amendment right is enforceable against Defendants through 42 U.S.C. § 1983.

117. By enforcing the Clean Hands Law against Plaintiffs, Defendants are violating this Fifth Amendment right, as they are barring Plaintiffs from obtaining or renewing their driver's licenses based on their debts to the District without inquiring into their ability to satisfy those debts and thus without determining that the nonpayment of those debts is willful and not because of their poverty.

118. Plaintiffs' nonpayment of their debts to the District is not, in fact, willful. Plaintiffs want to pay their debts but are financially unable to do so.

119. Defendants' enforcement of the Clean Hands Law against Plaintiffs and other DC residents financially unable to pay their parking and traffic debts to the District embodies elements of punitiveness and discrimination that violate the rights of citizens to equal treatment under the law.

120. As a result of Defendants' violation of Plaintiffs' Fifth Amendment right located at the convergence of due process and equal protection principles, Plaintiffs have suffered and continue to suffer harm, including but not limited to difficulty finding and maintaining employment, attending medical appointments, visiting and caring for family members, and fulfilling the other necessities of daily life.

COUNT III
Violation of Fifth Amendment Right to
Equal Protection under 42 U.S.C. § 1983
(Against All Defendants)

121. Plaintiffs re-allege and incorporate by reference all of the foregoing paragraphs.

122. The equal protection guarantee of the Fifth Amendment to the United States Constitution applies to the acts and omissions of the District and its officials.

123. The equal protection guarantee of the Fifth Amendment prohibits disparate, discriminatory debt collection laws and practices. It thus prohibits Defendants from imposing on Plaintiffs, as well as other DC residents of limited means who are in debt to the District government, remedies that are harsher than the remedies District law imposes on DC residents with civil money judgments to private parties.

124. This Fifth Amendment guarantee is enforceable against Defendants through 42 U.S.C. § 1983.

125. Defendants are violating this Fifth Amendment guarantee by enforcing the Clean Hands Law to disqualify Plaintiffs from obtaining or renewing driver's licenses based on their debts to the District government, but providing greater protections to, and thus not similarly penalizing, DC residents with civil money judgment debts to non-government parties.

126. As a result of Defendants' violation of Plaintiffs' rights under the Fifth Amendment's equal protection guarantee, Plaintiffs have suffered and continue to suffer harm, including but not limited to difficulty finding and maintaining employment, attending medical appointments, visiting and caring for family members, and fulfilling the other necessities of daily life.

COUNT IV
Violation of Fifth Amendment Right to
Substantive Due Process under 42 U.S.C. § 1983
(Against All Defendants)

127. Plaintiffs re-allege and incorporate by reference all of the foregoing paragraphs.

128. The substantive due process guarantee of the Fifth Amendment to the United States Constitution applies to the acts and omissions of the District and its officials.

129. This Fifth Amendment guarantee is enforceable against Defendants through 42 U.S.C. § 1983.

130. DC residents, including Plaintiffs, have a constitutionally protected property and liberty interest in obtaining and retaining a driver's license.

131. Substantive due process requires that any deprivation of Plaintiffs' and other DC residents' protected interest in a driver's license under the Clean Hands Law must be rationally related to a legitimate government objective.

132. The objective the DC Council articulated for the Clean Hand Law's prohibition on obtaining and renewing driver's licenses based on unpaid debt to the District is to secure the payment of that debt so as to generate revenue for the District.

133. Withholding driver's licenses from Plaintiffs and DC residents in poverty does not achieve that objective. No evidence indicates that being deprived of a driver's license will incentivize Plaintiffs or similarly situated DC residents to pay fines and fees they cannot afford to pay.

134. The Clean Hands Law not only fails to achieve its intended objective but undermines it. Rather than securing debt payments and generating revenue from DC residents in poverty, the Clean Hands Law makes it more difficult to secure payment and generate revenue because it makes it harder for Plaintiffs and similarly situated DC residents to find and sustain employment that would enable them to satisfy their debts.

135. Inasmuch as the Clean Hands Law not only fails to achieve its intended objective, but undermines that objective, Defendants' enforcement of the Clean Hands Law is not rationally related to any legitimate government purpose.

136. Defendants' enforcement of the Clean Hands Law against Plaintiffs thus violates substantive due process.

137. As a result of Defendants' violation of Plaintiffs' substantive due process rights, Plaintiffs have suffered and continue to suffer harm, including but not limited to difficulty finding and maintaining employment, attending medical appointments, visiting and caring for family members, and fulfilling the other necessities of daily life.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that the Court grant the following relief:

- a. Entry of judgment against Defendants on all Counts;
- b. A declaration that Defendants' enforcement of the Clean Hands Law against Plaintiffs is unlawful and violates Plaintiffs' rights under the Fifth Amendment to the United States Constitution, as alleged here;
- c. Preliminary and permanent injunctions prohibiting Defendants, their subordinates, agents, employees, representatives, and all others acting or purporting to act in concert with them or on their behalf from enforcing the Clean Hands Law to deny applications from Plaintiffs for driver's licenses because of unpaid debt;
- d. An award of attorneys' fees and costs under 42 U.S.C. §1988; and
- e. Such other and further relief as this Court may deem necessary and appropriate.

DATE: July 20, 2022

Respectfully Submitted,

/s/ Ariel Levinson-Waldman

Ariel Levinson-Waldman (Bar # 474429)
Joshua M. Levin (Bar # 1048088)

/s/ Seth Rosenthal

Seth Rosenthal (Bar # 482586)
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knbickelman@venable.com

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2022, a true and correct copy of the foregoing was filed via the CaseFile Xpress electronic filing service.

I further certify that, on the 14th day of July, 2022, Chad Copeland, Deputy Attorney General, Civil Litigation Division of the Office of the Attorney General for the District of Columbia, consented to service via e-mail only for all Defendants, and a copy of the foregoing was served via e-mail on the following:

Chad Copeland
Deputy Attorney General, Civil Litigation Division
Office of the Attorney General for the District of Columbia
Chad.Copeland@dc.gov

Stephanie Litos
Assistant Deputy Attorney General, Civil Litigation Division
Office of the Attorney General for the District of Columbia
Stephanie.Litos@dc.gov

Fernando Amarillas
Assistant Deputy Attorney General, Civil Litigation Division
Office of the Attorney General for the District of Columbia
Fernando.Amarillas@dc.gov

Tonia Robinson
Office of the Attorney General for the District of Columbia
Tonia.Robinson@dc.gov

DATED: July 20, 2022

Tzedek DC

/s/ Ariel Levinson-Waldman
D.C. Bar # 474429
Counsel for Plaintiffs



Superior Court of the District of Columbia
CIVIL DIVISION
 Civil Actions Branch
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
 Telephone: (202) 879-1133 Website: www.dccourts.gov

Evelyn Parham, et al.

Plaintiff

vs.

Case Number _____

District of Columbia

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 one (21) 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 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 seven (7) 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.

Ariel Levinson-Waldman

Clerk of the Court

Name of Plaintiff's Attorney

Tzedek DC

By _____

Address

Deputy Clerk

4340 Connecticut Ave NW, Suite 319, Washington, DC 20008

(202) 441-9959

Date _____

Telephone

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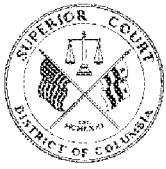
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IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED 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.

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Evelyn Parham, et al.

Demandante

contra

Número de Caso: _____

District of Columbia

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Ariel Levinson-Waldman
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Tzedek DC
 Dirección
 4340 Connecticut Ave NW, Suite 319, Washington, DC 20008

Por: _____
 Subsecretario

(202) 441-9959
 Teléfono

Fecha _____

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

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Evelyn Parham, et al.

Plaintiff

vs.

Case Number _____

Gabriel Robinson

Defendant

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Ariel Levinson-Waldman

Clerk of the Court

Name of Plaintiff's Attorney

Tzedek DC

By _____

Address

Deputy Clerk

4340 Connecticut Ave NW, Suite 319, Washington, DC 20008

(202) 441-9959

Date _____

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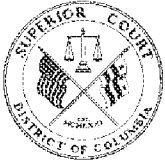
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Ariel Levinson-Waldman
 Nombre del abogado del Demandante

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 Teléfono

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Đê cò một bài dịch, hãy gọi (202) 879-4828
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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
 See reverse side for English original



Superior Court of the District of Columbia
 CIVIL DIVISION
 Civil Actions Branch
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
 Telephone: (202) 879-1133 Website: www.dccourts.gov

Evelyn Parham, et al.

Plaintiff

vs.

Case Number _____

Glen Lee

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 one (21) 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 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 seven (7) 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.

Ariel Levinson-Waldman

Clerk of the Court

Name of Plaintiff's Attorney

Tzedek DC

By _____
 Deputy Clerk

Address

4340 Connecticut Ave NW, Suite 319, Washington, DC 20008

(202) 441-9959

Date _____

Telephone

如需翻译,请打电话 (202) 879-4828

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

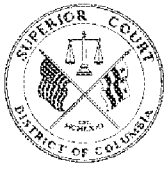
Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하 시면, (202) 879-4828 로 전화주세요. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያውቱ

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 (202-279-5100) 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
 Veá al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Evelyn Parham, et al.

Demandante

contra

Número de Caso: _____

Glen Lee

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Ariel Levinson-Waldman
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Tzedek DC
 Dirección
 4340 Connecticut Ave NW, Suite 319, Washington, DC 20008

Por: _____
 Subsecretario

(202) 441-9959
 Teléfono

Fecha _____

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Vea al dorso el original en inglés
 See reverse side for English original

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

Evelyn Parham, et al. _____ Case Number: _____

vs Date: July 18, 2022

District of Columbia, et al. _____ One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> Ariel Levinson-Waldman	Relationship to Lawsuit
Firm Name: Tzedek DC	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: _____ Six digit Unified Bar No.: _____ (202) 441-9959 474429	<input type="checkbox"/> Self (Pro Se)
	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ Declaratory Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar#: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
A. CONTRACTS	COLLECTION CASES	
<input type="checkbox"/> 01 Breach of Contract	<input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 16 Under \$25,000 Consent Denied
<input type="checkbox"/> 02 Breach of Warranty	<input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent	<input type="checkbox"/> 18 OVER \$25,000 Consent Denied
<input type="checkbox"/> 06 Negotiable Instrument	<input type="checkbox"/> 27 Insurance/Subrogation	<input type="checkbox"/> 26 Insurance/Subrogation
<input type="checkbox"/> 07 Personal Property	Over \$25,000 Pltf. Grants Consent	Over \$25,000 Consent Denied
<input type="checkbox"/> 13 Employment Discrimination	<input type="checkbox"/> 07 Insurance/Subrogation	<input type="checkbox"/> 34 Insurance/Subrogation
<input type="checkbox"/> 15 Special Education Fees	Under \$25,000 Pltf. Grants Consent	Under \$25,000 Consent Denied
	<input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only)	
B. PROPERTY TORTS		
<input type="checkbox"/> 01 Automobile	<input type="checkbox"/> 03 Destruction of Private Property	<input type="checkbox"/> 05 Trespass
<input type="checkbox"/> 02 Conversion	<input type="checkbox"/> 04 Property Damage	
<input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a)		
C. PERSONAL TORTS		
<input type="checkbox"/> 01 Abuse of Process	<input type="checkbox"/> 10 Invasion of Privacy	<input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice)
<input type="checkbox"/> 02 Alienation of Affection	<input type="checkbox"/> 11 Libel and Slander	<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)
<input type="checkbox"/> 03 Assault and Battery	<input type="checkbox"/> 12 Malicious Interference	<input type="checkbox"/> 19 Wrongful Eviction
<input type="checkbox"/> 04 Automobile- Personal Injury	<input type="checkbox"/> 13 Malicious Prosecution	<input type="checkbox"/> 20 Friendly Suit
<input type="checkbox"/> 05 Deceit (Misrepresentation)	<input type="checkbox"/> 14 Malpractice Legal	<input type="checkbox"/> 21 Asbestos
<input type="checkbox"/> 06 False Accusation	<input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)	<input type="checkbox"/> 22 Toxic/Mass Torts
<input type="checkbox"/> 07 False Arrest	<input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice)	<input type="checkbox"/> 23 Tobacco
<input type="checkbox"/> 08 Fraud		<input type="checkbox"/> 24 Lead Paint

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |

/s/ Ariel Levinson-Waldman

Attorney's Signature

July 18, 2022

Date