



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

FILED
 CIVIL DIVISION
 JAN 09 2023
 Superior Court of the
 District of Columbia
 2023 00111

Case No. _____

COMPLAINT

Jurisdiction of this Court is founded on D.C. Code § 11-921.

Thomas Donohue

PLAINTIFF

2200 Prout Street SE Apt 1

Address (No Post Office Boxes)

Washington DC 20020

City State Zip Code

202-525-4390

Telephone Number

tom@tmdenterprises.us

Email Address (optional)

vs

Holly Muhammad

DEFENDANT

1915 Minnesota Ave SE

Address (No Post Office Boxes)

Washington DC 20020

City State Zip Code

unknown

Telephone Number

8A03@anc.dc.gov

Email Address (optional)

1. Write a short and plain statement of your claim, including any relevant facts, dates, and locations:

On Monday Jan 2, 2023 while taking photos during the swearing in of my ANC Commissioner

Holly Muhammad my former ANC Commissioner aggressively approached me demanding that I leave her alone, she was so close that I had to back up and continue to walk back wards so keep her from making contact me. It wasn't until a fellow ANC Commissioner literally pulled her away from me that I was able to stop backing up. I have not been in Ms. Muhammads physical prescience since we crossed paths on election day besides that its been two or so years. Ms. Muhammad is upset a t my attempt to have her recalled after she blocked me from attending six months of ANC meetings

2. What relief are you requesting from the Court? Include any request for money damages.

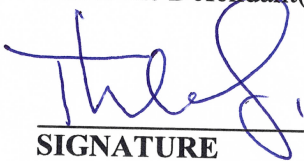
I am requested that Ms. Muhammad be order away from my physical being Also that while executing her duties as a public official she not be able to make public statemengts such as calling me a racist, telling neighbors during public meetings that I hate black women or that I hate muslims. All which are untrue and of which she has provided any evidence of her claims

3. State any other information, of which the Court should be aware:

On Oct 3, 2022 A flyer was distributed to a 5 or 6 block radius shortly after I filed a motion with the Board of Elections with the intent to recall against Commissioner Muhammad, this flyer showed not only my face and name but also said BEWARE!! that I was a SCAMMER and that bullied females. This is very similar to Commissioner Muhammads response to my recall peitition where she said " His words and contact toward me is that of a racist, bully & misogynist"
A police report was filed and is included with this motion.

SIGNATURE

To the best of my knowledge, everything in this Complaint is true and I am not filing this Complaint to harass the Defendant(s). Superior Court Civil Rules 11(b).



SIGNATURE

1/9/2023

DATE

Subscribed and sworn to before me this 9th day of January 2023.



(Notary Public/Deputy Clerk)



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

Thomas Donohue

Plaintiff

vs.

Abby Muhammad

Defendant

Case Number 2023 00111

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.

Self - Tom Donohue

Name of Plaintiff's Attorney

2200 Prout Street SE Apt 1

Address

Washington, DC 20020

202-525-4390 x 102

Telephone

如需翻译, 请打电话 (202) 879-4828

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

번역을 원하시면, (202) 879-4828로 전화하십시오.

የአገልግሎት ተጠያቂ ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court

By

Adrienne J. Marsh

Deputy Clerk

Date

1/9/2023

Để có mặt tại tòa, hãy gọi (202) 879-4828

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

Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

DIVISION 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

DONOHUE

Demandante

contra

Muhammad

Demandado

Número de Caso:

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.

Self - Tom Donohue

Nombre del abogado del Demandante

2200 Prout Street SE Apt1

Dirección

Washington, DC 20020

202-525-4390 x 102

Teléfono

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

번역이 필요하시면 (202) 879-4828 으로 전화하십시오

የአገር ገጽገም ለማግኘት (202) 879-4828 ይደውሉ

SECRETARIO DEL TRIBUNAL

Por:

Subsecretario

Fecha

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

CCN #21143119 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Oct 4, 2021 00:55	EVENT START DATE / TIME - EVENT END DATE / TIME Oct 3, 2021 23:00 - Oct 3, 2021 23:40	REPORT AUTHOR BRANDON TIERNAN 10510
WEATHER Clear	SHOTS FIRED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

REPORTING PARTY-1

REPORTING PARTY-1 (PERSON)

R-1 Donohue, Thomas Michael

HOME ADDRESS

2200 PROUT STREET SE, 1, WASHINGTON, DC 20020

PUBLIC NARRATIVE

BWC activated

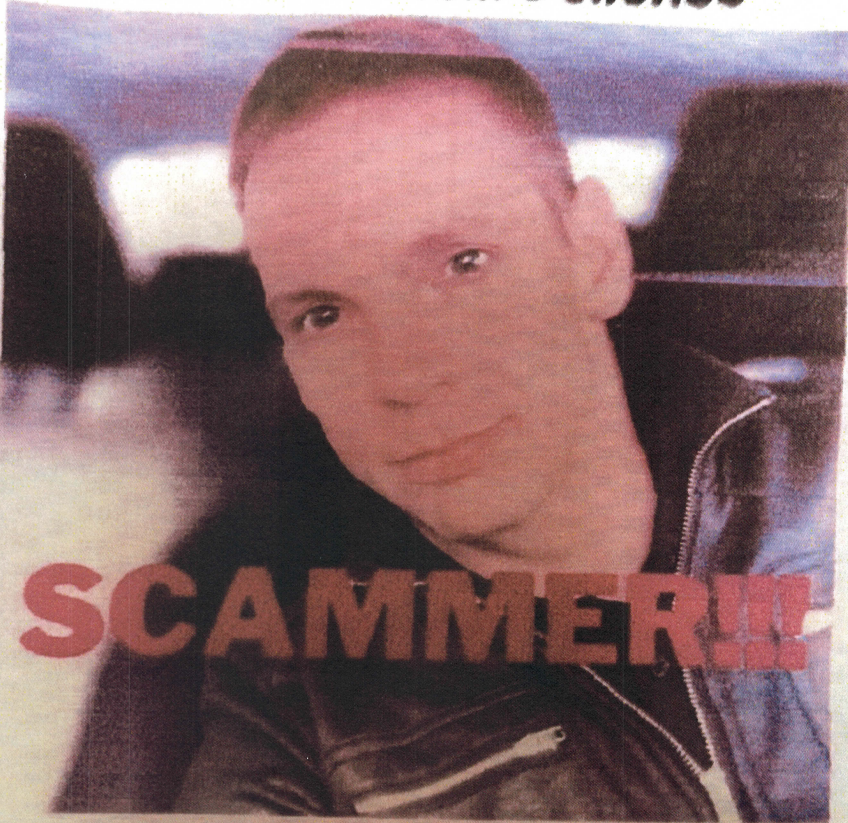
"This statement of facts is based on my best recollection without having the legal authorization to review any associated BWC footage to assist in writing this statement."

On the listed date, time, and location, RP-1 advised that an unknown subject was leaving flyers with his face on it around his home. The flyers that had RP-1's face on it said, "BEWARE!!!", "SCAMMER", and "BULLY FEMALES!!!" These flyers also had RP-'1's name on them.



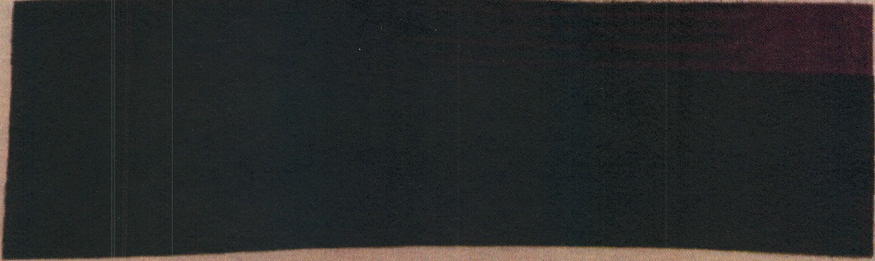
BEWARE!!!

Tom Donohue



SCAMMER!!!

**BULLY
FEMALES!!!**



HOLLY MUHAMMAD 8A01

(Name and Office)

Proposer(s) of Recall: THOMAS DONOHUE JR, 2200 PROUT STREET, SE APT 1 Washington, DC 20020

We, the undersigned, being duly registered voters in the District of Columbia who reside in the same Advisory Neighborhood Commission Single-Member District as the subject of this petition for recall, request that the District of Columbia Board of Elections hold a recall election as prescribed in Charter Amendment No. 2 to Title IV of the District of Columbia Self-Government and Governmental Reorganization Act (D.C. Official Code §§ 1-204.111 to 1-204.115).

**STATEMENT OF GROUNDS FOR RECALL OF:
FOR: Holly Muhammad, ANC 8A01**

During a July 13th ANC08 meeting, Commissioner & Chairwoman Muhammad (A801) ANC08 ejected Mr. Tom Donohue, an eight-year, small business owner from ANA801 without cause, discussion, or warning. Mr. Donohue joined other neighbors from ANC08 asking Commissioner Muhammad to elevate the logon of Commissioner Moore so the meeting could move on and so Commissioner Moore could properly represent her constituency. Having other matters that Mr. Donohue wanted to inquire about Mr. Donohue joined others asking her to simply elevate Commissioner Moore's login so that the meeting could move on matters to which Commissioner Muhammad immediately ejected him resulting in Mr. Donohue's inability to raise two matters pertaining to his neighborhood. In an email string sent to the ANC Director and all the ANC08 Commissioners, Muhammad become so racist in her responses that Mr. Donohue feels it rises to the level of being recalled. The responses included "You don't dictate to me. "I don't take instructions from the Proud Boys from Charlottesville. Don't email me again." And "Your threats of meetings and recalls don't frighten me. YOU don't frighten me. I AM NOT YOUR NEGRO! So, you better stay out of my way."

Holly Muhammad Response to Notice of Intent to Recall

At the close of our ANC 8A meeting on July 13, 2021, it was discovered that Commissioner Moore was logged in the meeting under MY name without my knowledge or permission

Commissioner Moore was asked several times to log out and log in under her ANC panelist link with her OWN name to have the floor

She refused and was not given the floor

Tom Donahue interjected himself in internal ANC business and was removed from the meeting for making derogatory remarks

Tom Donahue was out of order and was advised that he was

We have a code of conduct which includes not making derogatory comments about ANYONE

Tom Donahue has been threatening, harassing, and disrespecting me since he moved into this neighborhood

His words and conduct toward me is that of a racist, bully and misogynist

On the eve of election night, he charged at me in a threatening manner yelling that he was going to challenge me

He recently threatened to expose my fellow Commissioners to the media if they did not support his recall petition

He has been keeping my neighbors under illegal surveillance with his cameras making racist remarks about who enters their home

NOTE: Each signer of this petition must be a duly registered voter who resides in the same ANC Single-Member District as the subject of the recall. Each signer must sign their own name. Under no circumstances is any person permitted to sign another person's name or sign more than once. Each signer must print their name and residence address in full.

SIGNATURE AND ADDRESS OF PETITIONER		PRINTED NAME OF PETITIONER	DATE SIGNED	WARD
1	SIGNATURE	PRINTED NAME OF SIGNER		
	ADDRESS			
2	SIGNATURE	PRINTED NAME OF SIGNER		
	ADDRESS			
3	SIGNATURE	PRINTED NAME OF SIGNER		
	ADDRESS			

HOLLY MUHAMMAD, ANC 8A01

(Name and Office)

Proposer(s) of Recall: THOMAS DONOHUE JR, 2200 Prout Street, SE, Unit 1, Washington, DC, 20020

We, the undersigned, being duly registered voters in the District of Columbia who reside in the same Advisory Neighborhood Commission Single-Member District as the subject of this petition for recall, request that the District of Columbia Board of Elections hold a recall election as prescribed in Charter Amendment No. 2 to Title IV of the District of Columbia Self-Government and Governmental Reorganization Act (D.C. Official Code §§ 1-204.111 to 1-204.115).

**STATEMENT OF GROUNDS FOR RECALL OF:
FOR: Holly Muhammad, ANC 8A01**

My Name is Tom Donohue a small business owner, neighbor going on 9 years

Since July 13th during an ANC08 Commissioners Meeting where Ms. Holly Muhammad ejected only after echoing the same concerns (IN A CHAT Box) as others she has:

- Rejected & blocked notifications & access every meeting under her leadership
- Ignored every FOIA request requesting information and videos
- Lied on first attempt Recall Petition accusing me of acts untrue and intended to put my neighbors against me This is my second
- Petition the first was withdrawn as a result
- In response to asking for information she said, "I don't take instructions from Proud Boys of Charlottesville" and "YOU don't frighten me I AM NOT YOUR NEGRO! So, you better stay out of my way"
- Intimidated fellow Commissioners against a meeting to remove her
- Only permitted certain people to speak or attend meetings
- Called me Tom "willie lynch" Donohue"

Hopefully Holly's response will address the matters raised above her response should not attack me personally or to make up lies about me. I am not an elected official.

* Due to 200-word limit here supporting documentation, future responses to this petition & related materials can be viewed at <https://www.recallinghollymuhammad.com>.

Holly Muhammad Response to Notice of Intent to Recall

My name is Commissioner Holly Muhammad a long time Commissioner in our community

Since July 2021 Tom Donahue has harassed me via email, websites, FaceBook and continued efforts to disrupt our ANC 8A meetings by posting lies and derogatory remarks in our virtual meetings about myself.

He is a RACIST and hates Black Women and Muslims.

He is threatening and aggressive toward me and thought his privilege would allow him to dictate to and control me. He thought I was a weak helpless Black woman. In response to his aggression, I advised him "I am NOT his Negro and he does not dictate to me".

He put my Black neighbors under illegal surveillance with his cameras. Making racist remarks about who enters their homes calling their guests drug dealers. I was notified in writing of his actions and reported it to Commander Habcbullah.

He used the old "Willie Lynch" slave tactics to try to turn my fellow Commissioners against me to remove me as Chair, but he failed. We stayed united.

He went to every Agency in the City trying to bring false charges against me and he failed.

I had to get a restraining order against his fellow recruit

NOTE: Each signer of this petition must be a duly registered voter who resides in the same ANC Single-Member District as the subject of the recall. Each signer must sign their own name. Under no circumstances is any person permitted to sign another person's name or sign more than once. Each signer must print their name and residence address in full.

<u>SIGNATURE AND ADDRESS OF PETITIONER</u>		<u>PRINTED NAME OF PETITIONER</u>	<u>DATE SIGNED</u>	<u>WARD</u>
1	SIGNATURE	<u>PRINTED</u> NAME OF SIGNER		
	ADDRESS			
2	SIGNATURE	<u>PRINTED</u> NAME OF SIGNER		
	ADDRESS			
3	SIGNATURE	<u>PRINTED</u> NAME OF SIGNER		
	ADDRESS			

CCN #23000884 - PUBLIC INCIDENT REPORT

REPORT DATE / TIME Jan 2, 2023 16:27	EVENT START DATE / TIME - EVENT END DATE / TIME Jan 2, 2023 15:40 - Jan 2, 2023 15:50	REPORT AUTHOR Richard Geiger 9825 #S-999
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SHOTS FIRED

YES NO

REPORTING PARTY-1

REPORTING PARTY-1 (PERSON)

R-1 DONOHUE, THOMAS Jr

HOME ADDRESS

2200 PROUT STREET SE, 1, WASHINGTON, DC 20020

PUBLIC NARRATIVE

No BWC (not issued one)

On the listed date and time, RP-1 flagged down the undersigned reporting that RP-1 had been verbally accosted by Subj-1 inside of the Convention Center. There is an ongoing dispute between RP-1 and Subj-1, summarized further in the internal narrative. The dispute did not turn physical, but was witnessed by several individuals. RP-1 asked the undersigned for documentation regarding the incident.

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

DONOHUE

Case Number:

2023 00111

vs

Date:

MUHAMMAD

One of the defendants is being sued in their official capacity.

Name: <i>(Please Print)</i> THOMAS DONOHUE JR	Relationship to Lawsuit <input type="checkbox"/> Attorney for Plaintiff <input checked="" type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: _____	
Telephone No.: 202-525-4390 X 102	Six digit Unified Bar No.: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ 25,000 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

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

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

NATURE OF SUIT: *(Check One Box Only)*

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|---|--|
| <input type="checkbox"/> 01 Breach of Contract
<input type="checkbox"/> 02 Breach of Warranty
<input type="checkbox"/> 06 Negotiable Instrument
<input type="checkbox"/> 07 Personal Property
<input type="checkbox"/> 13 Employment Discrimination
<input type="checkbox"/> 15 Special Education Fees | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 27 Insurance/Subrogation Over \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 07 Insurance/Subrogation Under \$25,000 Pltf. Grants Consent
<input type="checkbox"/> 28 Motion to Confirm Arbitration Award (Collection Cases Only) | <input type="checkbox"/> 16 Under \$25,000 Consent Denied
<input type="checkbox"/> 18 OVER \$25,000 Consent Denied
<input type="checkbox"/> 26 Insurance/Subrogation Over \$25,000 Consent Denied
<input type="checkbox"/> 34 Insurance/Subrogation Under \$25,000 Consent Denied |
|---|---|--|

B. PROPERTY TORTS

- | | | |
|---|--|--------------------------------------|
| <input type="checkbox"/> 01 Automobile
<input type="checkbox"/> 02 Conversion
<input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) | <input type="checkbox"/> 03 Destruction of Private Property
<input type="checkbox"/> 04 Property Damage | <input type="checkbox"/> 05 Trespass |
|---|--|--------------------------------------|

C. PERSONAL TORTS

- | | | |
|--|--|---|
| <input type="checkbox"/> 01 Abuse of Process
<input type="checkbox"/> 02 Alienation of Affection
<input type="checkbox"/> 03 Assault and Battery
<input type="checkbox"/> 04 Automobile- Personal Injury
<input type="checkbox"/> 05 Deceit (Misrepresentation)
<input type="checkbox"/> 06 False Accusation
<input type="checkbox"/> 07 False Arrest
<input type="checkbox"/> 08 Fraud | <input type="checkbox"/> 10 Invasion of Privacy
<input checked="" type="checkbox"/> 11 Libel and Slander
<input type="checkbox"/> 12 Malicious Interference
<input type="checkbox"/> 13 Malicious Prosecution
<input type="checkbox"/> 14 Malpractice Legal
<input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)
<input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice) | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice)
<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)
<input type="checkbox"/> 19 Wrongful Eviction
<input type="checkbox"/> 20 Friendly Suit
<input type="checkbox"/> 21 Asbestos
<input type="checkbox"/> 22 Toxic/Mass Torts
<input type="checkbox"/> 23 Tobacco
<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)
(D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 02 Att. Before Judgment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 33 Whistleblower |
| <input type="checkbox"/> 16 Declaratory Judgment | |

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) | |

Attorney's Signature

Date



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

FILED
 CIVIL DIVISION
 JAN 09 2023
 Superior Court of the
 District of Columbia

Case No. 2023 00111

MOTION FOR RESTRAINING ORDER

TEMPORARY RESTRAINING ORDER
 An emergency order that lasts 14 days

PRELIMINARY INJUNCTION
 An emergency order that lasts until trial

Thomas Donohue Jr
 PLAINTIFF
2200 Prout Street SE Apt 1
 Address (No Post Office Boxes)
Washington DC 20020
 City State Zip Code
202-525-4390 x 102
 Telephone Number
tom@tmdenterprises.us
 Email Address (optional)

vs

Commissioner Holly Muhammad
 DEFENDANT
1915 Minnesota Ave SE
 Address (No Post Office Boxes)
Washington DC 20020
 City State Zip Code
unknown
 Telephone Number
8A03@anc.dc.gov
 Email Address (optional)

1. Is there an emergency? If yes, what is the nature of that emergency? Include facts, name(s), and location(s):
 On Monday, Jan 2, 2023 while taking photos of events of the swearing in Holly Muhammad aggressively
 ran up upon me causing me to have to back up as she warned me to leave her alone
 and that I better stay away from her. This was so aggressive that as I continued to back up from her
 a fellow ANC Commissioner Jamila White had to physically remove her from my personal space
2. Plaintiff requests that the Court order the Defendant(s) to:
 Stay away from plaintiff. Do not come into his immediate vicinity. She shall refrain as a
 elected official from making disparenting comments about him in her capacity
 of an ANC Commissioner.

The following questions are optional and can be helpful to the Court.

A. What is the relationship between Plaintiff and Defendant?

- | | |
|---|--|
| <input type="checkbox"/> Landlord & Tenant | <input type="checkbox"/> Family |
| <input type="checkbox"/> Dating relationship or child in common | <input type="checkbox"/> Friends or former friends |
| <input checked="" type="checkbox"/> Neighbors | <input type="checkbox"/> No relationship |
| <input type="checkbox"/> Co-Workers | <input type="checkbox"/> Other (explain): |

Holly Muhammad was until 1/1 Toms ANC Commissioner

B. Were the police contacted about the incident?

- Yes No

C. Was anyone arrested?

- Yes No

If yes, provide the name of the individual(s) arrested:

D. Are there any **prior** cases involving Plaintiff and Defendant in the Superior Court of the District of Columbia, or any other court(s)?

- Yes No

If yes, provide the case number(s) and location of the other court(s):

E. Are there any **ongoing** cases involving Plaintiff and Defendant in the Superior Court of the District of Columbia, or any other court(s)?

Yes No

If yes, provide the case number(s) and location of the other court(s):

F. Is there a written or oral lease agreement between Plaintiff and Defendant?

Yes No

G. Is there an eviction pending?

Yes No

If yes, provide the eviction date and explain:

H. Does this case involve a foreclosure?

Yes No

If yes, explain the status of the case:

I. Does this case involve students attending the same school?

Yes No

If yes, explain:

Continuation of TPO:

This behavior was also witnessed by my own ANC Commissioner Tanya Crawford as I was there at her request photographing her swearing-in. While Ms. Muhammad aggressively followed me as I backed up I said to her Holly you are an elected official please act like one I repeated this several times in hopes she would consider her behavior and stop forcing me to continue to walk backward assuring there was no contact between us. It is my opinion no doubt that had I not retreated away from Ms. Muhammad she would have physically contacted me.

Due to the history between Ms. Muhammad and myself, I immediately began to look for an MPD officer. I found Sergeant Richard Geiger who filed a misc. incident report # CCN23-000884 as a result of this incident. Ms. Muhammad is a public figure, and an elected official in the District of Columbia. In 2022, I filed a recall petition against Ms. Muhammad after she ejected me from a virtual ANC meeting and blocked me from six months' worth of meetings. As a result, Commissioner Muhammad started a smear campaign against me. Her initial response (see attached) to my first filing of a recall attached me personally claiming I had been "threatening, harassing and disrespecting" her since I moved into the neighborhood she continued to claim "His words and contact toward me is that of a racist, bully & misogynist" The several personally driven accusations have no merit she's never provided any evidence of her claims and has never filed a police report documenting any such interactions. On the evening of October 3, 2022, an unknown individual took and placed flyers that contained my name and photo along with the words "Beware! "Scammer and Bullies Females" (See attached flyer) This is consistent with the Board of Elections filing to my initial recall mentioned above.

Since my petition had been tabled by the Board of Elections to obtain consultation, I decided to withdraw the first petition only in order to update it with additional matters important to why she should be recalled, So I withdrew the first and immediately replaced it with an updated petition. Ms. Muhammad's response to it (again without any evidence or supporting documentation supporting her claims) said, ... "He is a RACIST and hates Black Women and Muslims, she lied and claimed that she had to get a "restraining order against his fellow recruit" I can only assume this is her second attempt to attached me to the Prout Boys of Charlottesville, however, I have no affiliation to the group anyone in the group. Ms. Muhammad knew that I would have to take the petition form around to my predominately Black neighbors to get signatures this was her attempt to interfere with this process and put my life in danger knowing my neighbors would read her words while I ask for their support.



**Superior Court of the District of Columbia
Civil Division - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
202-879-1133 | www.dccourts.gov**

Case Number: 2023-CAB-000111

Case Caption: Thomas Donohue v. Holly Muhammad

INITIAL ORDER

Initial Hearing Date: Friday, 04/21/2023	Initial Hearing Time: 9:30 AM	Courtroom Location: Remote Courtroom 517
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Shana Frost Matini.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure (“Super. Ct. Civ. R.”) 40-1, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated below, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing 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 hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance 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 Anita M. Josey-Herring

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb517

Meeting ID: 129 911 6415

- 2) When you are ready, click "Join Meeting".
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by "##"

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk's Office at 202-879-1133.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። የቃል ወይም የጽሑፍ ትርጓሜ ለመጠየቅ እባክዎን በመዝገብዎ የተዘረዘረውን የጸሀፊ ቢሮ (ክለርክ'ስ ኦፊስ) ያናግሩ። ለተጨማሪ መረጃ <https://www.dccourts.gov/language-access> ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?


The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?


The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?


- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.

 Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at dccourts.gov/coronavirus by clicking on the link that says, "List of Legal Service Providers for Those Without an Attorney."
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



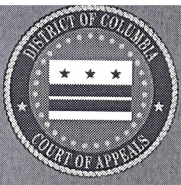
- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.). 
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.

Special Tips for Video Hearings

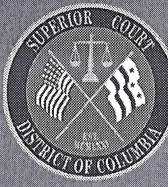
(Click here for more information)



- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.



District of Columbia Courts



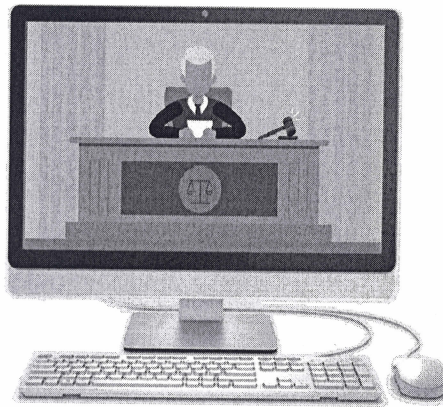
Tips for Using DC Courts Remote

The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are six remote access sites throughout the community which will operate: **Monday – Friday, 8:30 am – 4:00 pm.**

The remote site locations are:

<p>Remote Site - 1 Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p>Remote Site - 2 Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p>Remote Site - 3 Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p>Remote Site - 4 Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p>Remote Site - 5 Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p>Remote Site - 6 Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington DC 20009</p>

If you want to use a remote site location for your hearing, call **202-879-1900** or email DCCourtsRemoteSites@dcsc.gov **at least 24 hours before your hearing to reserve a remote access computer station.** If you require special accommodations such as an interpreter for your hearing, please call **202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements.**

You should bring the following items when you come to your scheduled site location

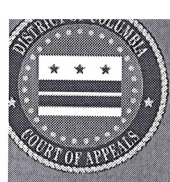
1. Your **case number** and any **hyperlinks** provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.
4. A facial covering will be required for entry into the remote hearing location; if you do not have a facial covering one will be provided.

***Safety and security measures are in place at the remote sites.**

Contact information to schedule your remote access computer station:

Call: **202-879-1900**

Email: DCCourtsRemoteSites@dcsc.gov



Tribunales del Distrito de Columbia

Consejos para usar los sitios de audiencia remota de los Tribunales de DC

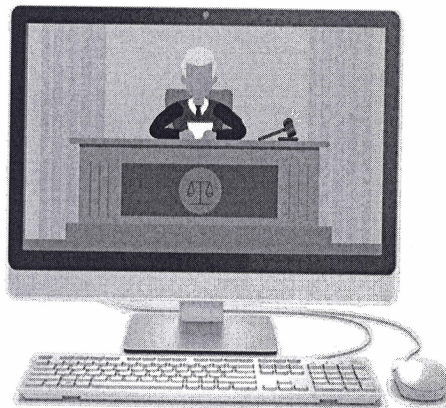


Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay seis sitios de acceso remoto que funcionarán de **lunes a viernes, de 8:30 am a 4:00 pm.**

Los centros de acceso remoto son:

<p style="text-align: center;">Sitio Remoto - 1</p> <p>Balance and Restorative Justice Center 1215 South Capitol Street, SW Washington, DC 20003</p>
<p style="text-align: center;">Sitio Remoto - 2</p> <p>Balance and Restorative Justice Center 1110 V Street, SE Washington, DC 20020</p>
<p style="text-align: center;">Sitio Remoto - 3</p> <p>Balance and Restorative Justice Center 118 Q Street, NE Washington, DC 20002</p>



<p style="text-align: center;">Sitio Remoto - 4</p> <p>Balance and Restorative Justice Center 920 Rhode Island Avenue, NE Washington, DC 20018</p>
<p style="text-align: center;">Sitio Remoto - 5</p> <p>Reeves Center 2000 14th Street, NW, 2nd Floor Community Room Washington, DC 20009</p>
<p style="text-align: center;">Sitio Remoto - 6</p> <p>Reeves Center 2000 14th Street, NW, Suite 300N Office of the Tenant Advocate Washington DC 20009</p>

Si desea usar un sitio remoto para su audiencia, llame al **202-879-1900** o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov **al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto.** Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al **202-879-1900** al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios.

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su **número de caso** y todos los **hipervínculos** que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.
4. Para ingresar al sitio de la audiencia remota deberá llevar una mascarilla facial; si no tiene mascarilla facial, se le proporcionará una.

***Los sitios de acceso remoto cuentan con medidas de seguridad y protección.**

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: **202-879-1900**

Correo electrónico: DCCourtsRemoteSites@dcsc.gov