



District of Columbia Board of Elections
1015 Half St SE, Suite 750
Washington, D.C. 20003



NOTICE OF INTENT TO RECALL

This is to acknowledge the receipt of a Notice of Intent to Recall the elected official named below:

Holly Muhammad

Name of Elected Official/ Office of Elected Official

Tom Donohue

Name of Proposer of Recall (Print)

2200 Prout Street SE, Unit 1 DC 20020

tom@tmdenterprises.us

Address and Telephone Number

Email Address



I, Thomas M Donohue Jr, swear of affirm that I am a registered qualified
(Print Name)

elector who resides in the District of Columbia and, if applicable, in the same ward or Single-Member District as the elected official whose recall I seek.

WARNING! Read the above statement and make sure it is true before you sign below. If you are convicted of making a false statement, you can be fined up to \$1,000 and/or jailed for not more than 180 days, or both (D.C. Official Code Section 22-2405).

Signature of Proposer:

Sworn to or affirmed and subscribed before me this 22nd day of March, 2022.

Signature of Notary Public or Board Official

STATEMENT OF REASONS TO RECALL

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- Petition the first was withdrawn as a result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"

Hopeful 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>**

"He is a
RACIST and
hates Black
Women and
Muslims."
- Holly Muhammad

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.

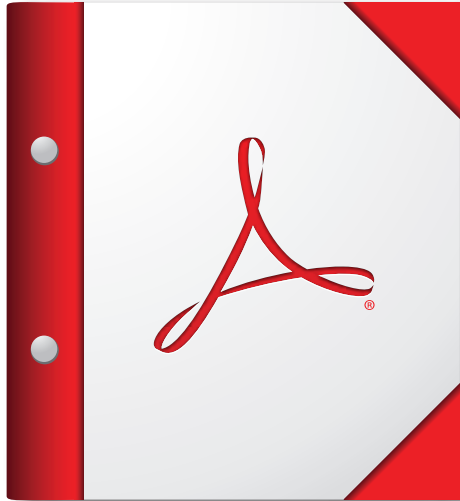
He is threatening and aggressive toward me and thought his privilege would allow him to dictate to and control me. He thought I was a weak helpless Black woman. In response to his aggression, I advised him "I am NOT his Negro and he does not dictate to me".

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 Habeebullah.

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



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From: [Tom Donohue](#)
To: [Muhammad, Holly \(SMD 8A01\)](#)
Cc: [Habeebullah, Durriyyah \(MPD\)](#); [Simon, Gottlieb \(OANC\)](#); [Glenn, Wendy \(Council\)](#); [Clark, Barbara \(SMD 8A02\)](#); [Thompson, Brian \(SMD 8A03\)](#); [Moore, Laneice \(SMD 8A04\)](#); [White, Jamila \(SMD 8A05\)](#); [McKinney, Robin \(SMD 8A06\)](#); [Tiller, Steven \(SMD 8A07\)](#)
Subject: Re: Ejection from Tonight's Meeting
Date: Wednesday, July 14, 2021 9:35:50 PM

Ms. Muhammad

You are an elected official who represents me as my ANC Commissioner if you don't want me emailing you regarding ANC matters I'd suggest you resign. However as long as you're an elected official and I'm emailing your government account regarding ANC matters I can't imagine I'm breaking the law.

Frankly it's disgusting you'd even suggest I have any affiliation to any white supremacy group or hate group, I don't even know why you'd lower yourself to such levels as it's not true what-so-ever. Your defamation just make you a liability to the district and frankly might even be enough to have you removed if not my recall application might.

Good luck defending your chairmanship during that special meeting. Now how about those two matters I asked you to bring up at the meeting were you able to perform those duties?

Respectfully,

Tom Donohue

Sent from my iPhone

On Jul 14, 2021, at 8:39 PM, Muhammad, Holly (SMD 8A01)
<holly.muhammad@anc.dc.gov> wrote:

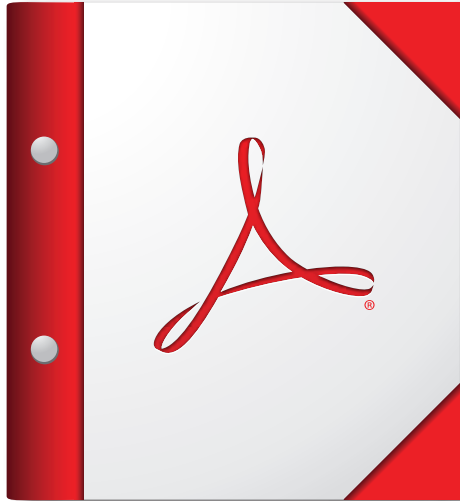
I have to repeat myself? So I will do it this time with the MPD copied.

"You don't dictate to me. I don't take instructions from the Proud Boys from Charlottesville. Don't email me again."

YOU are the liability in our community.

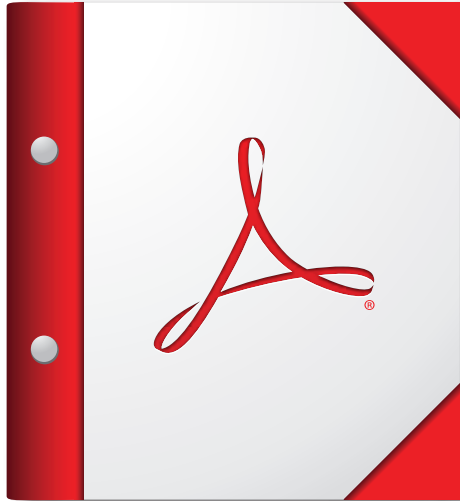
Commissioner Holly Muhammad
Chair, Advisory Neighborhood Commission 8A
2100-D Martin Luther King Ave SE
District of Columbia
202-422-4957

From: Tom Donohue <tom@tmdenterprises.us>



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Sent: Wednesday, July 14, 2021 8:26 PM

To: Muhammad, Holly (SMD 8A01) <holly.muhammad@anc.dc.gov>

Cc: Simon, Gottlieb (OANC) <Gottlieb.Simon@dc.gov>; Glenn, Wendy (Council) <wglenn@dccouncil.us>; Clark, Barbara (SMD 8A02) <8A02@anc.dc.gov>; Thompson, Brian (SMD 8A03) <8A03@anc.dc.gov>; Moore, Laneice (SMD 8A04) <8A04@anc.dc.gov>; White, Jamila (SMD 8A05) <8A05@anc.dc.gov>; McKinney, Robin (SMD 8A06) <8A06@anc.dc.gov>; Tiller, Steven (SMD 8A07) <8A07@anc.dc.gov>

Subject: Re: Ejection from Tonight's Meeting

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This is so completely inappropriate. You're an elected official. Your such a liability to the district.

Sent from my iPhone

On Jul 14, 2021, at 8:11 PM, Muhammad, Holly (SMD 8A01) <holly.muhammad@anc.dc.gov> wrote:

You don't dictate to me. I don't take instructions from the Proud Boys from Charlottesville. Don't email me again.

Commissioner Holly Muhammad
Chair, Advisory Neighborhood Commission 8A
2100-D Martin Luther King Ave SE
District of Columbia
202-422-4957

From: Tom Donohue <tom@tmdenterprises.us>

Sent: Wednesday, July 14, 2021 5:59 PM

To: Muhammad, Holly (SMD 8A01) <holly.muhammad@anc.dc.gov>; Simon, Gottlieb (OANC) <Gottlieb.Simon@dc.gov>

Cc: Clark, Barbara (SMD 8A02) <8A02@anc.dc.gov>; Thompson, Brian (SMD 8A03) <8A03@anc.dc.gov>; Moore, Laneice (SMD 8A04) <8A04@anc.dc.gov>; White, Jamila (SMD 8A05) <8A05@anc.dc.gov>; McKinney, Robin (SMD 8A06) <8A06@anc.dc.gov>; Tiller, Steven (SMD 8A07) <8A07@anc.dc.gov>

Subject: RE: Ejection from Tonight's Meeting

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the

content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Ms. Muhammad,

Please do not dictate where the need is for an investigation is, you do not get to decide that. I assure you this matter and other matters will be investigated.

Tomorrow you can make your case. I am inviting each ANC Commissioner to a live round table discussion where all of these matters can and will be discussed. All of your opinions can be heard and discussed. I welcome you to what I intend to be a respectful, engaging and informative discussion. Not all Commissioners will appear together however everyone will be heard and given opportunity to express their concerns.

Tomorrow you and the rest of the commissioners are welcome to join in a discussion at 7:00 PM if you choose not to participate your voice will not be heard. We will be discussing internal and external concerns of not only your fellow commissioners but also constituents. You have until 3pm to accept this invitation. Upon each commissioner's acceptance you will receive the login information and instructions on how to proceed. Please note this live event will be broadcast widely I hope everyone will plan on attending.

If each commissioner would kindly reply all to this email with intentions on whether you'll be joining this discussion or not I would greatly appreciate it. Please note this is not an official ANC meeting and topics discussed are not that of the entire ANC's view. Topics and matters discussed are that of each individual elected official and or constituent.

Everyone Please let us know. I assure you this meeting will be civil and respectable I trust you all can act like adults and can maintain professionalism. Remember it will be your constituents that will be watching.

Ms. Muhammad please forward me the link to the Zoom meeting. It is a requirement that you provide this access to the meeting upon request.

Very Respectfully,

Tom Donohue

From: Muhammad, Holly (SMD 8A01) <holly.muhammad@anc.dc.gov>

Sent: Wednesday, July 14, 2021 2:34 PM

To: Tom Donohue <tom@tmdenterprises.us>; Simon, Gottlieb (OANC) <Gottlieb.Simon@dc.gov>; Glenn, Wendy (Council) <wglenn@DCCOUNCIL.US>

Cc: Clark, Barbara (SMD 8A02) <8A02@anc.dc.gov>; Thompson, Brian (SMD 8A03) <8A03@anc.dc.gov>; Moore, Laneice (SMD 8A04) <8A04@anc.dc.gov>; White, Jamila (SMD 8A05) <8A05@anc.dc.gov>; McKinney, Robin (SMD 8A06) <8A06@anc.dc.gov>; Tiller, Steven (SMD 8A07) <8A07@anc.dc.gov>

Subject: Re: Ejection from Tonight's Meeting

Good afternoon,

There is no need for an investigation. I did remove you from the meeting. You were invited as an attendee. You were not invited as a panelist nor are you an 8A Commissioner. You chose to inject yourself into an internal ANC issue and you were out of order in doing so. You then decided to make disparaging remarks against myself in the chat because you did not want to understand my decision, (b/c you were injecting yourself in a matter that did not involve you), and you were promptly removed. And from the content of your email your privilege leads you to believe you can comment on an issue that does not involve you without actual fact. So you are still out of order. It is my job as Chair to conduct and maintain control of our meetings. And that is what I did.

Commissioner Holly Muhammad
Chair, Advisory Neighborhood Commission 8A
2100-D Martin Luther King Ave SE
District of Columbia
202-422-4957

From: Tom Donohue <tom@tmdenterprises.us>

Sent: Tuesday, July 13, 2021 10:45 PM

To: Simon, Gottlieb (OANC) <Gottlieb.Simon@dc.gov>

Cc: Muhammad, Holly (SMD 8A01) <holly.muhammad@anc.dc.gov>; Clark, Barbara (SMD 8A02) <8A02@anc.dc.gov>; Thompson, Brian (SMD 8A03) <8A03@anc.dc.gov>; Moore, Laneice (SMD 8A04) <8A04@anc.dc.gov>; White, Jamila (SMD 8A05) <8A05@anc.dc.gov>; McKinney, Robin (SMD 8A06) <8A06@anc.dc.gov>; Tiller, Steven (SMD 8A07) <8A07@anc.dc.gov>

Subject: Ejection from Tonight's Meeting

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content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Tuesday, July 13, 2021
Via Email

Gottlieb Simon Executive Director
Office of Advisory Neighborhood Commissions
1350 Pennsylvania Ave., N.W., Ste. 11
Washington, D.C. 20004

CC: ANC 8A Commissioners

Director Simon,

I immediately request the preservation of this evenings ANC8A meeting which was conducted via the Zoom platform and lead by my ANC Commissioner and Chairwoman Holly Muhmmad.

This letter should be considered an official correspondence and entered into the business of said commission.

My name is Tom Donohue, I am a small business owner of a photographer and videography business operating from my home office located at 2200 Prout Street SE, Washington, DC 20020.

This evening I was ejected by the Chairwoman when I added my request and concerns about the insistence of silencing her fellow Commissioner and elected official Commissioner Moore. The Chairwoman refused to upgrade Commissioner Mores access to panelist access so she could properly represent her constituents. When the Chairwoman refused to upgrade and allow Commissioner More to be heard several ANC8A Constituents began to request the Chairwoman to allow her the access. I joined that sediment. Nearly immediately and without. warning or cause Chairwoman Muhammad ejected me from the meeting preventing me from rejoining.

Chairwoman Muhammad not only silenced one of her own constituents she also silenced the duly elected official of Commissioner More. As of this moment I do not know if this rises to the level of legal recourse, however if any laws were broken here, I'd expect and request this matter being referred to the appropriate agency for review. Given I was only voicing my concern via a chat box there was nothing that could have risen to the level of being ejected especially without the consent or discussion by the commissioners. In addition, refusal to allow Commissioner More from being heard and representing her constituency is completely unacceptable.

I call upon your office investigate this matter immediately and a copy of the recording and chat session from tonight's meeting be delivered via email at the earliest convenience. I'd also like to see if Commissioner Muhammad covered any of the topics which I asked her to review earlier in the week via email.

Respectfully,

Thomas M. Donohue Jr.

I'm using Adobe Acrobat.

You can view "ANC Meeting ejection.pdf" at:

<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:589efb0f-4ac5-42d9-b460-9cd423546f68>

You can view "ANC Meeting ejection.jpg" at:

<https://documentcloud.adobe.com/link/track?uri=urn:aaid:scds:US:03e7f1d7-c571-4e88-8221-b1f83a71e990>

<image001.jpg>