

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

LINDSEY BELL-KERR

:

[REDACTED]

:

Plaintiff,

:

v.

:

BALTIMORE-WASHINGTON
CONFERENCE OF THE UNITED
METHODIST CHURCH

:

11711 E Market Place
Fulton, MD 20759

:

:

Serve: Superintendent of Corporations
Department of Consumer and
Regulatory Affairs
Business and Professional
Licensing Administration
Corporations Division
Wells Fargo Bank
7175 Columbia Gateway Drive
Lockbox # 92300
Columbia, MD 21046

:

:

:

:

:

:

Case No. _____

and

:

AMERICAN UNIVERSITY
4400 Massachusetts Avenue, NW
Washington, DC 20016

:

:

Serve: Douglas Kudravetz
4400 Massachusetts Ave. NW
Washington, DC 20016

:

:

and

:

MARK SCHAEFER

:

[REDACTED]

:

Defendants.

COMPLAINT FOR DAMAGES
**(Sexual Assault and Battery; Intentional Infliction of Emotional Distress;
Breach of Fiduciary Duty; Negligent Employment)**

Plaintiff, Lindsey Bell-Kerr, respectfully demands judgment against Defendants, Baltimore-Washington Conference of the United Methodist Church, American University, and Mark Schaefer, on the grounds and in the amount set forth below:

JURISDICTION AND VENUE

1. Jurisdiction and venue are vested in this Court pursuant to D.C. Code Sec. 11-921 (1981 ed., as amended), since a substantial part of the events, acts and/or omissions giving rise to Plaintiff's claims occurred in the District of Columbia.

PARTIES

2. Plaintiff, Lindsey Bell-Kerr, is an adult resident of the state of California.

3. Defendant Baltimore-Washington Conference of the United Methodist Church (the "Methodist Conference") is a Maryland nonprofit religious corporation, doing business in the National Capital area, including Maryland and the District of Columbia.

4. The Methodist Conference is the regional chapter of the United Methodist Church.

5. Defendant American University ("AU") is a university located in the District of Columbia.

6. Defendant Mark Schaefer is an adult resident of the State of Maryland.

7. At the time of the facts set forth in the following section, Defendant Schaefer was employed as American University's United Methodist Chaplain.

8. In his role as United Methodist Chaplain, Defendant Schaefer was supervised by American University Chaplain Reverend Joseph Eldridge, worked for the joint benefit of Defendants AU and the Defendant Methodist Conference, and regularly interacted with other agents, servants, and employees of Defendants in completing his work tasks who had knowledge of his behavior.

9. When Reverend Eldridge retired in 2016, Defendant Schaefer was hired by American University and appointed by the Methodist Conference to the role of American University Chaplain.

10. At all times relevant, Reverend Eldridge and Defendant Schaefer were acting within the course and scope of their employment by Defendants AU and the Methodist Conference.

11. American University was founded in 1893 by the General Conference of the Methodist Episcopal Church (the predecessor of The United Methodist Church) with the intent of creating a national Methodist university to train those who would enter public service and government.

12. The Kay Spiritual Life Center (the “Kay Center”) is American University’s campus religious life center, which Defendant AU itself refers to as “American University’s place for meaning, purpose, and community.”¹

13. At all times relevant, the Kay Spiritual Life Center housed various religious denominations in campus offices.

¹ <https://www.american.edu/ocl/kay/>.

14. Defendant AU knew that the various faith groups provided religious counseling and faith services to Defendant AU's enrolled students through those facilities.

15. Upon information and belief, Defendant AU invited, contracted with, and/or employed Defendant the Methodist Conference onto campus to provide such services to students.

16. Together, Defendants AU and the Methodist Conference engaged in a joint venture to provide religious activities, counseling, education, ministry, and other services regarding the United Methodist faith for American University students, including Plaintiff.

17. At all times relevant, Defendant the Methodist Conference invited members of the public, including American University students, to participate in activities, programs, and religious services, and selected pastors to educate, minister to, and provide pastoral services to individuals and families, including Plaintiff.

18. Defendant the Methodist Conference provided religious and counseling services to students enrolled at American University.

19. Defendant the Methodist Conference and/or Defendant AU selected, approved, and/or hired Defendant Mark Schaefer ("Schaefer") for the position of United Methodist Chaplain at the Kay Center for purposes of counseling and educating students about the United Methodist faith. In that role, Defendant Schaefer's role was to provide spiritual, ethical, and moral guidance, counseling, and education to American University students and to perform the other duties of a pastor, including developing a rapport with

and seeing students in a variety of after-hours settings, to help develop a pastoral relationship.

20. When he provided counseling services to students at the Kay Spiritual Life Center, Defendant Schaefer was acting within the course and scope of his employment by Defendants AU and the Methodist Conference.

21. Defendants AU and the Methodist Conference are liable for the negligent and other acts and/or omissions of their employees, including Reverend Eldridge and Defendant Schaefer, pursuant to *respondeat superior* and vicarious liability principles.

22. At all times relevant, Defendants AU and the Methodist Conference authorized and empowered Defendant Schaefer to perform all the duties of a Chaplain discussed above, as well as any other duties not specifically mentioned. Defendants AU and the Methodist Conference knew that as part of his duties as Chaplain, Defendant Schaefer would be in a position of trust, confidence, respect, and authority over members of the Methodist Conference, especially student members, including Plaintiff. Defendants AU and the Methodist Conference retained the right to control the means and methods used by pastors/chaplains in fulfilling their duties.

23. While performing his duties as a pastor, Defendant Schaefer gained the trust, confidence, and respect of Plaintiff and the other students as a spiritual guide, valuable and trustworthy mentor, counselor, and authority figure; and gained the comfort, permission, acquiescence, and trust of the students to spend substantial periods of time alone with them, by virtue of the position and cloaking of authority granted by Defendants AU and the Methodist Conference.

24. As a result, Plaintiff was conditioned to trust Defendant Schaefer, to comply with his directions and instructions, and to respect Defendant Schaefer as a person of authority in spiritual, moral, and ethical matters. This course of conduct is referred to by sexual abuse experts, and therefore also in this Complaint, as “grooming.”

FACTS

25. Plaintiff incorporates by reference all allegations in the Complaint.

26. In fall 2002, Plaintiff was enrolled as a freshman attending her first semester at American University in Washington, DC.

27. Early in the Fall 2002 semester, Plaintiff sought out the United Methodist student offices at the Kay Spiritual Life Center at American University to learn more about Methodist theology and inclusivity for gay and lesbian congregants. Plaintiff was in search of a more inclusive faith than the Roman Catholic Church, the faith in which she was raised.

28. Defendant Schaefer, in his role as United Methodist Chaplain, offered to counsel Plaintiff about United Methodist theology and they met for several meetings in his private office in the Kay Center. During those meetings, Defendant Schaefer explained United Methodist Eucharistic theology, assured Plaintiff the faith group was welcoming to lesbian students like herself and encouraged her to get involved. He also encouraged very open and honest discussions of her personal history and upbringing in a Catholic home in Pennsylvania. He assured her that the United Methodist student group was a safe place for her as a gay student. This was the first time Plaintiff had been welcomed into a religious community by an adult who claimed support of gay people.

29. Assured and encouraged by Defendant Schaefer, Plaintiff joined the campus ministry and started regularly attending group events.

30. Defendant Schaefer often interacted with the students, coordinating and leading activities such as weekly Sunday worship, dinner outings, social events on the campus quad like volleyball and other sports, and parties to celebrate holidays such as Halloween and Christmas.

31. Plaintiff also encountered Defendant Schaefer regularly in the Kay Center. The Kay Center housed offices for several differently affiliated chaplains and religious staff. Outside of Defendant Schaefer's basement private office, there was an area for students to sit and gather for meetings. Upstairs, there was a space for worship. Within the course and scope of his job duties, Defendant Schaefer would regularly be present in the Kay Center, in the worship space, his office, and the communal gathering space, not limiting his hours or participation to regular business hours, and often present when students gathered in the night.

32. During the fall semester of 2002, Defendant Schaefer began grooming Plaintiff by singling her out for his attention. He told her she was more mature and intelligent than other students, separating her from her peers by her "special" characteristics. He told Plaintiff she was "not connecting with" the other students because she was different. Defendant Schaefer offered to provide private tutoring services to Plaintiff in the Russian language, which was Plaintiff's minor course of study at the time.

33. Over the course of the Fall semester 2002, Defendant Schaefer escalated his contact and grooming with Plaintiff, including physical contact. He would regularly touch her hair or offer a massage to her neck or back. Plaintiff observed that he was engaging in similar behavior with other students, as well, which served to normalize such contacts in Plaintiff's eyes.

34. Defendant Schaefer regularly invited groups of students out to dinner around Washington, DC (off-campus), but then the dinners began targeting Plaintiff individually for invitation. Once, he messaged her that he was outside her dorm and ready to take her to dinner immediately and expected compliance.

35. Defendant Schaefer escalated the intimacy of the conversations with Plaintiff during those outings, including frequent discussion about his past sexual partners and encounters. He often complained about his inability to maintain proper adult relationships because of the hours spent with the students in the ministry.

36. Defendant Schaefer first privately touched Plaintiff during an encounter in his office in connection with counseling at the Kay Center shortly before the 2002 Thanksgiving holiday. Defendant text and/or computer messaged Plaintiff, asking if she needed help. She replied that she was in her pajamas and he instructed her to come to the Kay Center, in the pajamas, which were purple with cows on them. When Plaintiff arrived, Defendant proceeded to give her a massage and touch her leg and knee, escalating his physical grooming of Plaintiff.

37. Over the 2002 Thanksgiving break, Plaintiff returned home and, for the first time, informed her mother that she was a lesbian. That school break was an extremely difficult, vulnerable time for Plaintiff.

38. When she returned to school, she told Defendant Schaefer about having “come out” to her mother and sought religious counseling from him. During all relevant times, Defendant Schaefer was familiar with Plaintiff’s vulnerability and struggling with her “coming out” and feelings of being an outsider.

39. In December 2002, Defendant Schaefer first arranged for Plaintiff to appear for tutoring sessions at his private residence. He showed her his photo albums and described his prior sexual encounters with the women depicted. That evening, he played Plaintiff scenes from the movie “The Witness” in which Harrison Ford kisses the Amish woman.

40. On or about December 8, 2002, Defendant Schaefer told Plaintiff that he had a crush on her, specifically, that Defendant had been discussing his crush on Plaintiff with a student friend of hers and Defendant stated the crush was “academic” because Plaintiff was gay. Plaintiff informed Defendant that she was truly gay and was not interested in him.

41. On or about December 13, 2002, Plaintiff was struggling emotionally after completing her finals and spiraling in a vulnerable emotional state due to pressures and confusion in her life, including the situation with Defendant Schaefer. She was wandering off campus in the rain. Defendant Schaefer texted her to come to the United Methodist Student Association Christmas party. Plaintiff said she wanted to be alone,

but he insisted. She then appeared for the party. Defendant Schaefer learned of her inability to leave campus to travel home for several days while waiting for a ride from a friend.

42. On or about December 14, 2002, Defendant Schaefer invited Plaintiff to a movie, but the movie plan did not materialize. Instead, he brought Plaintiff to his residence. He first massaged Plaintiff, then initiated “cuddling” while they were sitting on a futon, and then moved her to the bed in his studio apartment. He touched her face and asked if she wanted a kiss, to which she replied “no.” Plaintiff moved back to the futon. She asked to leave. Defendant then stated he felt pathetic, used additional guilt, shame, and manipulation tactics, and moved Plaintiff back to the bed, where he kissed her without permission and progressed to touching her genitals. Without her consent, Defendant continued the manipulation tactics and proceeded to force Plaintiff into oral sex. Defendant did not return Plaintiff to her dorm but kept her there that night and took her to an off-campus church with him the next morning. After church, he drove Plaintiff back to his residence and continued his sexual assault on Plaintiff. He manipulated her and said, “you’re at least bisexual now,” and justified that since they did not have genital intercourse their actions were not a true “sin.” When he was finished with Plaintiff that day, he instructed her to get herself home by Metro.

43. Soon thereafter, Plaintiff returned home for the holidays. Plaintiff carpooled home for winter break with the student president of the campus ministry, “D.D.” The student asked Plaintiff about the nature of her relationship with Defendant Schaefer. Plaintiff informed the student “D.D.” about the sexual relationship imposed by

Defendant Schaefer. That student “D.D.” then worked with the campus ministry vice president, “S.T.” and the campus ministry intern to report the misconduct of Defendant Schaefer.

44. D.D. and S.T. (together, the “Reporting Students”) wrote to United Methodist District Superintendent E. Allen Stuart (an employee of Defendant the Methodist Conference) regarding their concerns about Defendant Schaefer’s impropriety. Reverend Stuart met with the Reporting Students on or about January 14, 2003, and instructed them to keep the situation “local” so as not to “damage Mark’s career.”

45. The Reporting Students also notified Reverend Eldridge, who was then Defendant AU’s University Chaplain, of Defendant Schaefer’s gross misconduct.

46. In early spring 2003, the Reporting Students again raised the issue and wrote to United Methodist Bishop Felton May (deceased) (another employee of Defendant the Methodist Conference), asking that Defendant Schaefer be reassigned elsewhere.

47. District Superintendent Stuart and Bishop May followed up with the Reporting Students for a second meeting, which was held in Defendant Schaefer’s office with him present.

48. Defendants AU and the Methodist Conference did not conduct any reasonable investigation into Defendant Schaefer’s misconduct.

49. Defendants AU and the Methodist Conference did not contact Plaintiff or ask her to inform them of what had happened. In fact, Defendants AU and the

Methodist Conference minimized the reporting students' complaints to the extent that they felt obligated to apologize for reporting Defendant Schaefer's gross breach of trust and sexual abuse. Defendants AU and the Methodist Conference effectively exonerated Defendant Schaefer, retained him in his capacity as Campus Minister, and reaffirmed his position of trust, which enabled him to seek out additional victims as a sexual predator.

50. Defendant Schaefer, now obviously aware that his misconduct had been reported, called Plaintiff while she was home over the holidays and told her not to tell anyone else. He said that he was in a lot of trouble due to the reporting students but believed he had worked out a "solution" by voluntarily agreeing not to be alone with female students or with students questioning their sexuality.

51. In January 2003, Plaintiff returned to American University for her second semester of freshman year. She met with Defendant Schaefer upon her return, and he expressed anger at Plaintiff for exposing his conduct and told her that her conduct placed him at risk. He threatened that he could be fired, and it would be her fault.

52. Over the course of the semester, Plaintiff attempted to return to her school life and integrate with friends and activities. Defendant Schaefer remained in her sphere, at first meeting only in public. However, as the semester progressed, he again initiated private contact. He arranged rides for Plaintiff alone and attempted to initiate highly inappropriate conversations, for example, by asking her to talk with him about masturbation.

53. During this semester, Plaintiff continued to emotionally spiral. Her grades fell and she investigated transferring colleges but found it financially infeasible.

54. Defendant Schaefer continued his systematic targeting and abuse of Plaintiff by again initiating improper sexual interaction in July 2003. One of Defendant Schaefer's common tactics was to procure alone time with targets by offering car rides. During the course of providing Plaintiff a ride home in July 2003, he parked outside of Plaintiff's residence and assaulted her by touching her genitals and forcing her to touch his genitals. This conduct occurred on multiple occasions. He also called Plaintiff multiple times and attempted to initiate "phone sex."

55. During this time, Plaintiff began drinking alcohol to numb and cope.

56. In July 2003, Plaintiff attempted to commit suicide by cutting her wrists in the bathtub of her shared apartment. Her friend/roommate found her and alerted EMS.

57. Plaintiff began counseling from an American University counseling center therapist and reported the assaults and misconduct by Defendant.

58. Following Plaintiff's suicide attempt, Defendant Schaefer did not attempt any further direct sexual contact. However, because he had so fully infiltrated her community and social network, Plaintiff still found it effectively impossible to avoid Defendant Schaefer on campus. In addition, Defendant Schaefer targeted Plaintiff's high school friends and built social media connections with them. He continued to monitor, shadow, and circle Plaintiff for the years to come.

59. Despite actual notice—from multiple sources—that Defendant Schaefer had sexually abused one of its students, Defendant AU not only continued to employ Defendant Schaefer; it promoted him to the position of University Chaplain and expanded his teaching opportunities, effectively ratifying his improper behavior.

60. In a 2019 letter from American University personnel to Plaintiff, they admitted that “Schaefer was expected to set and maintain emotional and physical boundaries with you, as someone who he was providing pastoral counseling. His conduct demonstrates poor judgment, is highly inappropriate and unethical, and constitutes unprofessional and serious misconduct. As such, we have taken appropriate personnel action in accordance with our other policies.”

61. Defendant Schaefer’s pattern of grooming, abuse, and forced sexual acts violated Plaintiff’s personal dignity and inflicted upon her severe pain and mental anguish, physical injury, fright, shame, mortification, nervousness, humiliation, indignity, insult, and embarrassment, directly causing her to attempt suicide.

62. As a further direct result of Defendant Schaefer’s pattern of grooming, abuse, and forced sexual acts, Plaintiff has incurred, and will continue to incur, substantial medical expenses; and has suffered, and will continue to suffer, extreme physical and emotional pain, suffering, and anguish, as well as other damages.

63. In grooming, forcing sexual contact upon, and sexually abusing Plaintiff, Defendant Schaefer acted with evil motive, with the intent to injure, or in willful disregard for the rights of Plaintiff; moreover, Defendant Schaefer’s conduct itself was outrageous and reckless towards the safety of Plaintiff.

64. Managing agents of Defendants AU and the Methodist Conference had actual knowledge of Defendant Schaefer’s misconduct by January 2003 (at the latest); however, rather than terminate him, Defendants AU and the Methodist Conference participated in, authorized, and/or approved the ongoing abuse by continuing to afford

Defendant Schaefer a position of power and religious authority over American University students, permitting the abuse to continue without intervention or remedy. Indeed, Defendants AU and the Methodist Conference recklessly exposed students to a known sexual predator for at least an additional 15 years.

COUNT I
(Assault & Battery: All Defendants)

65. Plaintiff incorporates by reference all allegations in the Complaint.

66. As set forth above, from October 2002 through August 2003, Defendant Schaefer repeatedly abused his position of religious authority to create in Plaintiff the reasonable apprehension that he would force unlawful sexual contact on her, under circumstances where it was clear to Plaintiff that Defendant Schaefer had the ability to carry out the sexual contact in question.

67. As such, Defendant Schaefer committed an assault under District of Columbia law.

68. As set forth above, from October 2002 through August 2003, Defendant Schaefer repeatedly abused his position of religious authority to unlawfully force harmful and offensive sexual contact and acts upon Plaintiff without her consent.

69. As such, Defendant Schaefer committed a battery under District of Columbia law.

70. As a result of Defendant Schaefer's assault and battery, Plaintiff suffered the injuries and damages set forth above.

71. At the time he assaulted and battered Plaintiff, Defendant Schaefer was acting within the course and scope of his agency for Defendants AU and the Methodist Conference; as such, they are vicariously liable for his conduct.

COUNT II
**(Intentional infliction of Emotional Distress:
Conduct of Defendant Schaefer)**

72. Plaintiff incorporates by reference all allegations in the Complaint.

73. Defendant Schaefer's repeated grooming practices, sexual batteries, manipulation, shaming of, and threats against the Plaintiff constitute extreme and outrageous conduct.

74. When engaging in that extreme and outrageous conduct, Defendant Schaefer either intended to inflict emotional distress on Plaintiff or—in grooming a college freshman who he knew to have special vulnerabilities, while he was himself in his mid-thirties and knew that he wielded a position of power, authority, respect, and dominance by virtue of his job title and moral position with the Church and University—selfishly acted with reckless disregard for whether his actions would inflict such distress.

75. Defendant Schaefer's conduct directly caused Plaintiff to suffer the severe emotional distress and other injuries set forth above.

76. At the time he inflicted severe emotional distress on Plaintiff, Defendant Schaefer was acting within the course and scope of his agency for Defendants AU and the Methodist Conference; as such, they are vicariously liable for his conduct.

COUNT III
**(Intentional infliction of Emotional Distress:
Conduct of Defendants AU and the Methodist Conference)**

77. Plaintiff incorporates by reference all allegations in the Complaint.

78. Despite having actual knowledge by January 2003 (at the latest) that Defendant Schaefer was sexually abusing a teenage American University freshman, Defendants AU and the Methodist Conference chose to participate in the ongoing abuse by continuing to afford Defendant Schaefer a position of power and religious authority over American University students, permitting the abuse to continue without intervention or remedy. Defendants AU and the Methodist Conference's actions amounted to extreme and outrageous conduct.

79. When engaging in that extreme and outrageous conduct, Defendants AU and the Methodist Conference either intended to inflict emotional distress on Plaintiff or acted with reckless disregard for whether their actions would inflict such distress.

80. Defendants AU and the Methodist Conference's conduct directly caused Plaintiff to suffer the severe emotional distress and other injuries set forth above.

COUNT IV
(Breach of Fiduciary Duty: All Defendants)

81. Plaintiff incorporates by reference all allegations in the Complaint.

82. By holding themselves (and Defendant Schaefer personally) out as qualified United Methodist clergy, ministers, religious instructors, counselors, and holy individuals, Defendants encouraged Plaintiff to entrust herself to their care for spiritual and emotional counseling, and to divulge intimate personal information as part of that

process. Members of the clergy are uniquely powerful, and young church members seeking counseling are uniquely vulnerable to abuse because of the counselee's initial vulnerability in seeking help; the clerical counselor's control of the environment; the confidentiality of the relationship; the leverage gained from unilateral, vulnerable self-revelation; the hierarchical, spiritual superiority or worthiness associated with the clergy; and the counselee's desire to achieve spiritual guidance, forgiveness, and even redemption. That gross disparity in power obviates any notion of consent and renders uniquely abusive the sexual acts Defendant Schaefer imposed upon the Plaintiff.

83. Rather than provide the spiritual and emotional guidance Plaintiff sought, Defendant Schaefer violated her trust, turning the power imbalance to his advantage and using his position of authority, respect, and dominance to groom and then abuse a college freshman he knew to have special vulnerabilities.

84. Upon learning of Defendant Shaefer's actions, Defendants AU and the Methodist Conference did not reprimand him; instead, they became accomplices in his ongoing abuse, thereby violating their own fiduciary duties to Plaintiff.

85. As a result of Defendants' breaches of their fiduciary duties to her, Plaintiff suffered the injuries and damages set forth above.

COUNT V
(Negligent Employment:
Defendants AU and the Methodist Conference)

86. Plaintiff incorporates by reference all allegations in the Complaint.

87. At all times relevant, Defendants AU and the Methodist Conference owed a duty to Plaintiff and all other American University students to exercise reasonable care

to hire, train, supervise, and retain employees who were fit for the work required of them.

88. In light of the acts described above (briefly: grooming a college freshman whom he knew to have special vulnerabilities, while he was himself in his mid-thirties and knew that he wielded a position of authority, respect, and dominance by virtue of his job title and moral position with the Church and University), Defendant Schaefer was plainly unfit to perform the work of United Methodist Chaplain and the affiliated counseling roles he performed for Defendants AU and the Methodist Conference.

89. Prior to hiring Defendant Schaefer, Defendants AU and the Methodist Conference never performed a proper background check on him.

90. Defendants AU and the Methodist Conference never adequately trained Defendant Schaefer regarding boundaries with students.

91. Defendants AU and the Methodist Conference never trained their other employees and volunteers to identify grooming behavior committed by their colleagues and intervene to prevent sexual abuse.

92. Defendants AU and the Methodist Conference did not properly supervise Defendant Schaefer to ensure that he was not grooming American University students for sexual abuse.

93. Further, in light of the multiple warnings and complaints they received about Defendant Schaefer, Defendants AU and the Methodist Conference knew or should have known that Defendant Schaefer was sexually abusing a teenage American

University freshman; was unfit and that this unfitness created a risk to others, including Plaintiff and all other American University students; and was a sexual predator.

94. In spite of this actual knowledge, Defendants AU and the Methodist Conference inexplicably chose not to immediately terminate Defendant Schaefer. Such actions were especially harmful because if an offender is accused and then faces no consequences, that whitewashing of egregiously improper actions can teach the abuser that he can act with impunity, thereby emboldening the abuser.

95. Defendant Schaefer's unfitness harmed Plaintiff by inflicting the injuries and damages set forth above.

96. Defendant AU's and Defendant the Methodist Conference's negligent hiring, training, supervision, and retention of Defendant Schaefer was a substantial factor in causing Plaintiff's injuries and damages.

WHEREFORE, Plaintiff, Lindsey Bell-Kerr, demands compensatory damages from Defendants in the full and just amount of Ten Million Dollars (\$10,000,000.00), plus interest and costs.

WHEREFORE, Plaintiff, Lindsey Bell-Kerr, demands punitive damages from Defendants in the full and just amount of Ten Million Dollars (\$10,000,000.00), plus interest and costs.

JURY DEMAND

Plaintiff requests a trial by jury on all of the above claims.

Respectfully submitted,

REGAN ZAMBRI LONG PLLC

By: /s/ Amy S. Griggs
Patrick M. Regan #439016
pregan@reganfirm.com
Amy S. Griggs #982493
agriggs@reganfirm.com
Christopher J. Regan #1018148
cregan@reganfirm.com
1919 M Street, NW, Suite 350
Washington, DC 20036
PH: (202) 463-3030
FX: (202) 463-0667
Counsel for Plaintiff

and

BLANKINSHIP & KEITH, PC

By: /s/ Peter S. Everett
Peter S. Everett #290270
peverett@bklawva.com
Julie M. Porto #252899
jporto@bklawva.com
4020 University Drive, Suite 300
Fairfax, VA 22030
PH: (703) 691-1235
FX: (703) 691-3913
Counsel for Plaintiff

Regan Zambri Long
1919 M Street, NW
Suite 350
Washington, D.C. 20036

202-463-3030

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

Lindsey Bell-Kerr

Case Number: _____

vs

Date: 04/28/2021

Baltimore-Washington Conference of the
United Methodist Church et al.

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

Name: <i>(Please Print)</i> Amy S. Griggs	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: Regan Zambri Long PLLC	
Telephone No.: 202-463-3030	Six digit Unified Bar No.: 982493

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ 10,000,000.00 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"/> 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 checked="" 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 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/ Amy S. Griggs

Attorney's Signature

04/28/2021

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

Lindsey Bell-Kerr

Plaintiff

vs.

Case Number _____

BALTIMORE-WASHINGTON CONFERENCE OF THE UNITED METHODIST CHURCH

Serve: Superintendent of Corporations, DCRA Defendant
Business & Professional Licensing Administration, Corporations Division
Wells Fargo Bank, 7175 Columbia Gateway Drive, Lockbox #92300,
Columbia, MD 21046
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.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하 시면, (202) 879-4828 로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያው቉

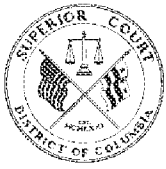
By _____
 Deputy Clerk

Date _____

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
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

_____ Demandante

contra

Número de Caso: _____

_____ 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.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

Por: _____

Dirección

Subsecretario

Teléfono

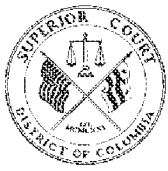
Fecha _____

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
 如需翻译, 请拨打 (202) 879-4828 如需翻译, 请拨打 (202) 879-4828 如需翻译, 请拨打 (202) 879-4828

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

Lindsey Bell-Kerr

Plaintiff

vs.

Case Number _____

American University

Defendant

Serve: Douglas Kudravetz
 4400 Massachusetts Ave. NW
 Washington, DC 20016

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.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하 시면, (202) 879-4828 로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያው቉

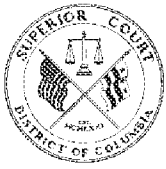
By _____
 Deputy Clerk

Date _____

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
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

_____ Demandante

contra

Número de Caso: _____

_____ 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.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

Por: _____

Dirección

Subsecretario

Teléfono

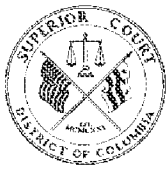
Fecha _____

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
 如需翻译, 请拨打 (202) 879-4828 如需翻译, 请拨打 (202) 879-4828 如需翻译, 请拨打 (202) 879-4828

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

Lindsey Bell-Kerr

Plaintiff

vs.

Case Number _____

Mark Schaefer

Defendant

Serve: Mark Schaefer
 5910 Osceola Road
 Bethesda, MD 20816

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.

Clerk of the Court

 Name of Plaintiff's Attorney

 Address

 Telephone

By _____
 Deputy Clerk

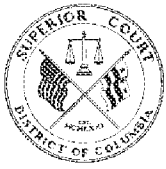
Date _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 번역을 원하 시면, (202) 879-4828 로 전화주세요 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያው቉

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

_____ Demandante

contra

Número de Caso: _____

_____ 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.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

Por: _____

Dirección

Subsecretario

Teléfono

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeier au (202) 879-4828 pour une traduction Đê cò một bài dịch, hãy gọi (202) 879-4828
 如需翻译, 请打电话 (202) 879-4828 如需翻译, 请打电话 (202) 879-4828 የአገልግሎት ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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