# IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

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CHARLOTTE DJOSSOU	
5806 Black Hawk Drive	)
Oxon Hill, MD 20745	, )
,	)
Plaintiff,	) Civil Action No. <u>2020 C</u> A 004292 B
<b>v.</b>	) Jury Demand
DISTRICT OF COLUMBIA	<i>)</i>
c/o Office of the Attorney General	)
441 – 4th Street, NW	
Washington, DC 20001	)
Serve:	)
	)
Ms. Gale Rivers,	)
Office of the Attorney General	
441 – 4th Street N.W. Suite 600 South,	
Washington, D.C. 20001	)
Ind Page Enquire Chief Pigle Officer	)
Jed Ross, Esquire, Chief Risk Officer, Office of Risk Management,	)
441 – 4th Street, N.W., Suite 800 South,	
Washington, D.C. 20001	
11 ubinington, D.C. 20001	, )
Defendant.	,
	,

### **COMPLAINT AND JURY DEMAND**

### **Preliminary Statement**

1. Plaintiff Charlotte Djossou ("Sergeant Djossou" or "Plaintiff"), by and through counsel, brings this action against the Metropolitan Police Department ("MPD" or "Defendant") for back pay and compensatory damages.

### Jurisdiction and Venue

2. This court has subject matter jurisdiction over this matter pursuant to D.C. Code §

11-921(a)(6).

3. Venue lies in this court because the events giving rise to Plaintiff's claims occurred in the District of Columbia.

### **Parties**

- 4. Plaintiff Sergeant Djossou is a citizen of the United States. She currently resides in Oxon Hill, Maryland. The Metropolitan Police Department ("MPD") has employed Sergeant Djossou since 2004.
- 5. Defendant District of Columbia is a municipal corporation, the local government of Washington, D.C., and operates and governs the MPD pursuant to the laws of the District of Columbia. In this case, the District of Columbia acted through its agents, employees, and servants.

### **Factual Allegations**

### Sergeant Djossou's Professional Background

- 6. Djossou joined the Army in June 1997 and was honorably discharged in June 2001.
- 7. Djossou was then part of the National Guard from June 2001 to May 2005. In April 2003, Djossou was deployed to Iraq. Djossou returned to the United States, and remained with the National Guard, primarily on inactive status.
- 8. In September 2004, MPD hired Djossou as an officer. She was at the Police Academy until July 2005, when she was initially assigned to the Fifth District.
- 9. On June 14, 2009, MPD promoted Djossou to Investigator after she passed a promotion exam, and assigned her to MPD's Youth Division, where she worked on child sex and physical abuse cases.

- 10. On September 26, 2010, MPD promoted Djossou to Detective (Grade 2) after she passed a promotion exam, and assigned her to the Seventh District, where she worked in the Criminal Investigations Division (CID).
- On April 8, 2012, MPD promoted Djossou to Sergeant after she passed a promotion exam, and assigned her to the Fourth District, where she worked in a patrol capacity.
- 12. On February 11, 2014, an opening for a Detective-Sergeant position in the Investigative Services Bureau's criminal investigations division became available. The Detective-Sergeant position is a non-patrol position, is more prestigious than a patrol position, and is a stepping-stone to further advancement in the MPD.
- 13. Sergeant Djossou applied for a transfer to the Detective-Sergeant position the following day.
- 14. Sergeant Djossou followed up about her application with her union representative and with then-Assistant Chief Peter Newsham, who supervised the Investigative Services Bureau.
- Then-Assistant Chief Newsham agreed to recommend Sergeant Djossou for a transfer to a Detective-Sergeant position the next time MPD had an opening. However, then-Assistant Chief Newsham asked Sergeant Djossou if she could instead transfer to the Narcotics Special Investigations Division (NSID) on a temporary assignment, because NSID needed "more women."
- 16. Sergeant Djossou agreed, with the understanding that then-Assistant Chief
  Newsham would recommend her transfer to a Detective-Sergeant position when the next opening
  became available.

## MPD Retaliated Against Sergeant Djossou after She Reported MPD's Tactics to Target Men of Color and to Increase the Number of Felonies.

- 17. In June 2015, while Sergeant Djossou was assigned to the NSID, one of her subordinates, Officer Gregory Brown, reported to her that that Lieutenant James Boteler had been instructing officers to target groups of young men of color, "jump out" at them, and search them without probable cause, which clearly violated their rights under the Fourth Amendment of the United States Constitution. These "jump outs" were only being conducted in neighborhoods with a large number of minority residents, and not in predominately white neighborhoods.
- 18. On June 30, 2015, Sergeant Djossou reported this illegal tactic to her first-line supervisor, then-Lieutenant Mustafa Haamid. Lieutenant Haamid told her that Lieutenant Boteler should not be giving this illegal instruction.
- 19. Lieutenant Haamid told Sergeant Djossou that he would tell Commander Robin Hoey about Sergeant Djossou's report of the illegal tactic.
- 20. The following day, on July 1, 2015, Commander Hoey sent out an email demanding that all the officers cease those practices. He emphasized that the "jump out style tactics" that focused on minorities were contrary to policy and the directives of the Chief of Police. Commander Hoey emphasized that the NSID "was created to counter this type of activity and no one will put this very good and productive unit in jeopardy by doing things that the COP [Chief of Police] says MPDC will never do again. Further anybody who has knowledge of this should bring to my attention and those folks will be removed from this unit. Officials better not be conducting these." Commander Hoey's directive was sent to Lieutenant Haamid, who then forwarded it to Sergeant Djossou.
- 21. MPD management, including Lieutenant Haamid, began to retaliate against Sergeant Djossou, because they were upset that she had reported this illegal tactic.

- About two weeks after Sergeant Djossou reported the illegal tactic, Lieutenant Haamid excluded Sergeant Djossou from meetings and activities necessary for performing her job duties, including those relating to operations and fieldwork, thereby adversely affecting her ability to do her work.
- 23. At the end of July 2015, Lieutenant Haamid began sending Sergeant Djossou emails that made unfounded criticisms of her supervision. This was the first time that Sergeant Djossou's management had ever criticized her supervision of her subordinates.
- 24. On September 24, 2015, Lieutenant Haamid gave Sergeant Djossou a downgraded performance evaluation and targeted her for discipline. Sergeant Djossou prepared an appeal of her performance evaluation, and submitted it to her union representative. However, she never heard anything further about that appeal, and the downgraded evaluation remains in her personnel file.
- 25. MPD then investigated Sergeant Djossou for an alleged attendance issue, even though she had never had any prior issues with attendance. MPD was unable to substantiate the claims against her, and the case was closed as unfounded.
- 26. On October 15, 2015, Sergeant Djossou filed a harassment and hostile work environment complaint against Lieutenant Haamid. MPD conducted an administrative investigation, but closed out the complaint in only four days, on the purported ground that it was a "labor / management issue," not an EEO issue.
- 27. Lieutenant Haamid also stopped assigning Sergeant Djossou to cover incidents involving arrests. Instead, Lieutenant Haamid consistently assigned Sergeant Djossou to minor incidents, such as car accidents, thereby reducing her opportunities to be credited for promotional purposes. Lieutenant Haamid was transferred out in April 2016, and in his

departure email to his colleagues (including Sergeant Djossou), he apologized for his workplace conduct, writing "For anyone of you who felt that I may have treated unfairly or had a disagreement, may you forgive me, I am only human." However, MPD took no steps to address his prior discrimination against Sergeant Djossou.

- 28. In June 2018, Commander John Haines took charge of NSID and instituted policies to increase the number of felony arrests. He openly stated, "we want felonies." This is due to the fact that NSID officers are financially incentivized to increase these felony numbers through receiving additional overtime due to having to testify in court for felony cases, and through MPD's promotional system which rewarded officers who handled more important crimes, such as felonies.
- 29. In June 2018, during a roll call Sergeant Djossou attended, Officer Terry Couch instructed NSID officers to target large groups of men of color in poverty-stricken areas and to search them without probable cause. He also instructed them to violate established Body Worn Camera (BWC) directives by purposely delaying turning on the BWC until after the initiation of the search.
- 30. Officer Couch also told the officers, including Sergeant Djossou and Sergeant Alvin Cardinal, to use the "snake" tactic, which involved taking two to four MPD cars to largely minority, low-income neighborhoods, locating a group of people usually people of color and jumping out and searching the individuals without probable cause.
- 31. On June 8, 2018, Sergeant Djossou reported to Assistant Chief Robert Contee this illegal tactic that Officer Couch intended to implement delaying turning on the BWCs, and doing jump out searches without probable cause in minority neighborhoods.
  - 32. On June 8, 2018, Sergeant Djossou also reported to Assistant Chief Contee that

another officer, Officer James Craig, had changed the type of charge entered into the system to cover up that he had made a field arrest that was not justified. Officer Craig also pointed his service weapon at the driver and threatened to kill him during a traffic stop. Assistant Chief Contee initiated a formal investigation of Officer Craig, for a "false arrest."

- 33. Commander Haines, Lieutenant Anthony Greene, and Sergeant Alvin Cardinal were present at roll call and approved the directives that Officer Couch gave.
- 34. Upon reviewing the BWC footage, Commander Haines realized that Officer Craig had in fact made a baseless arrest, ordered an investigation into whether Officer Craig had made a false arrest, and determined that he had, thereby confirming Sergeant Djossou's disclosure.

  Officer Craig is white. The MPD disciplined him but did not fire him.
- 35. On June 18, 2018, MPD retaliated against Sergeant Djossou for her disclosure to Assistant Chief Contee by transferring her to Patrol Services North, in the Fourth District, instead of the more prestigious and open Detective-Sergeant position at the Investigative Services Bureau, which then-Assistant Chief Peter Newsham had promised her in 2014.
- 36. MPD Internal Affairs further retaliated against Sergeant Djossou by opening up another unfounded disciplinary investigation. MPD closed this investigation as unfounded in or around April 2019.
- 37. On October 12, 2018, Lieutenant Anthony Washington of the Fourth District also investigated Sergeant Djossou for alleged neglect of duty. MPD closed that investigation on December 31, 2018, for "insufficient facts."

# MPD Retaliated Against Sergeant Djossou after She Reported MPD's Tactic of Misclassifying Felonies as Misdemeanors.

38. MPD has a long history of trying to distort crime statistics in Washington, D.C., including downgrading felonies to misdemeanors.

- 39. MPD districts compete against each other to get the largest reduction in the crime statistics. Every summer for the past decade (or longer), each district is told by the Captain or Commander of the need to show the largest reduction in crime statistics as part of the Summer Crime Prevention Initiative. As set forth below, MPD improperly reduced crime statistics by downgrading a number of felonies to misdemeanors, so that there will be "fewer" felonies in the statistics.
- 40. The promotions of MPD captains and commanders are tied to the size of the reduction in crime statistics in their districts. The Captain whose district has the greatest reduction will be promoted to Commander, and the Commander whose district has the greatest reduction will, in turn, be promoted to Assistant Chief. These promotions also result in a significant salary increase. This practice has continued for a decade or longer.
- 41. On March 12, 2019, Captain Sean Conboy sent a memo which stated that theft charges should be downgraded to a misdemeanor only if the amount stolen was worth \$25.00 or less. Previously, MPD had no maximum threshold for misdemeanor theft charges. However, despite this directive, other MPD captains and officers then started downgrading other theft charges for amounts higher than \$25.00 if the theft could not be solved at all, where for example they could not identify witnesses. The result is that felony thefts were now being recorded as misdemeanors, solely because the theft could not be solved, regardless of the dollar value of what was stolen.
- 42. On June 14, 2019, Sergeant Djossou reported MPD's tactic of downgrading felonies to misdemeanors to Commander Randy Griffin. As a result of Sergeant Djossou's report to Commander Griffin, over 100 "misdemeanors" were upgraded back to felonies.
  - 43. On October 10, 2019, Lieutenant Jarlath Cady gave Sergeant Djossou a poor

performance evaluation. Specifically, he lowered Sergeant Djossou's earlier rating from 39 (overall score of 4, "exceeds expectations") to 24 (overall score of 3, "meets expectations"). Moreover, in 3 of the more subjective areas of the 9 performance dimensions (professionalism; communication; and administrative investigations), she was rated as "needs improvement" (2 on a 1-5 scale). This downgrading was not based on any actual changes in her performance or any other justifiable factor. (On April 28, 2020, Lieutenant Cady submitted the "Justification of Rating," see § 59, infra.)

- 44. On October 17, 2019, Sergeant Djossou requested a meeting with Assistant Chief Lamar Greene to discuss her concerns that the downgraded performance evaluation was retaliatory. They met on November 6, 2019 (*infra*).
- 45. On October 24, 2019, Sergeant Djossou responded to an Assault with a Dangerous Weapon Knife (Domestic Violence) report.
- 46. At the scene, Sergeant Djossou saw that Lieutenant Tatjana Savoy had downgraded a charge for felony violent crime to a misdemeanor of Simple Assault. This was a domestic violence with knife crime; based on Sergeant Djossou's interview of the complainant, she realized that the severity of the crime made it an unambiguous felony, not a misdemeanor.
- 47. On October 24, 2019, Sergeant Djossou notified Captain Conboy of Lieutenant Savoy's action in downgrading the charge, but he did not take any corrective action to address the issue. Sergeant Djossou also notified MPD Internal Affairs of this issue.
- 48. On November 6, 2019, Sergeant Djossou met with Assistant Chief Greene of Patrol Services North. She told Assistant Chief Greene that Commander Griffin was encouraging the downgrading of crimes with no basis to do so. She also told him that MPD was retaliating against her (*i.e.*, the downgraded performance evaluation and the refusal to consider

her for a transfer) due to her report to Captain Conboy about this improper downgrading of felony crimes to misdemeanors.

- 49. Sergeant Djossou also renewed her request for a transfer to a Detective-Sergeant position. Later that same day, Sergeant Djossou sent a follow-up email to Assistant Chief Greene, in which she reiterated her concerns about retaliation.
- 50. MPD continued to retaliate against Sergeant Djossou by failing to transfer her to the Detective-Sergeant position in the Investigative Services Bureau's criminal investigations division, as now-Chief Newsham had promised her he would do in 2014.
- 51. On December 14, 2019, Sergeant Djossou wrote to Chief Newsham, as she still had not heard back about her transfer to a non-patrol assignment. In her email, she set forth her concerns about the misclassification of crimes, and the ensuing retaliation caused by her reports. In response, on December 24, 2019, Chief Newsham and MPD lawyer Mark Veihmeyer offered Sergeant Djossou a settlement agreement to transfer to the First District. She did not sign or agree to this transfer.
- 52. After Sergeant Djossou's refusal of the transfer to the First District, Commander Griffin retaliated against Sergeant Djossou by having her work eight days straight four 8-hour days and four 10-hour tours from December 27, 2019 to January 3, 2020. This was unnecessary and other MPD Sergeants were not similarly required to work eight days straight during this time period.
- 53. On January 3, 2020, Sergeant Djossou wrote to D.C. Councilmember Charles Allen (Chair, Committee on the Judiciary and Public Safety), to report her concerns that she was being retaliated against for having reported that the Fourth District was underreporting crime statistics in order to claim a greater reduction in crime than warranted. She requested a meeting

with his office to discuss her protected conduct and the retaliation. Councilmember Allen's staff arranged for Sergeant Djossou to testify to the Committee about these issues.

- 54. On January 16, 2020, Sergeant Djossou, along with Officer Tabitha Knight, testified to the D.C. Council Committee on the Judiciary and Public Safety, at a public hearing that was televised and at which MPD senior management attended.
- 55. At that hearing, Sergeant Djossou testified that her first whistleblowing report was in July 2015, when she reported the improper targeting and arrests of groups of minority youths (the "jump out" arrests), and that as a result of her reports, Lieutenant Haamid gave her a downgraded evaluation in September 2015 and he initiated an investigation of her for unfounded attendance issues.
- 56. She also testified that in June 2018, she again reported that the NSID officers were being instructed to target large groups of minority men, in poor neighborhoods, without probable cause, and to do so in violation of the Body Worn Camera orders, and that NSID officers were making improper felony arrests. She testified that after making that report, Assistant Chief Contee retaliated by transferring her to the Fourth District, denying her access to her email, and targeting her again in a disciplinary investigation.
- 57. She also testified that in 2019, she again reported illegal conduct, which resulted in downgrading her performance evaluation for that year.
- 58. Although the D.C. Council promised that it would follow up on Sergeant Djossou's reports, it has done nothing to investigate or follow up to the current time. In the meantime, MPD has continued its pattern of retaliation against Sergeant Djossou.
- 59. On April 28, 2020, MPD Lieutenant Cady submitted a "Justification of Rating" for the downgraded performance rating that he gave Sergeant Djossou on October 10, 2019,

Supra. The "Justification of Rating" falsely stated that Lieutenant Cady counseled Sergeant Djossou on June 13, 2019 and issued a PD 62-E (the Job Performance Documentation Form, used to document actions that could lead to discipline or downgraded evaluations) regarding body worn cameras. This was false because she never saw this PD 62-E until it was included with the "Justification of Rating." Further, the PD 62-E was not even mentioned by Lieutenant Cady during the October 10, 2019 performance rating meeting he had with Sergeant Djossou.

- Tutt counseled Sergeant Djossou regarding a use of force investigation on June 8, 2019. As before, Sergeant Djossou did not see the PD 62-E for that investigation until it was included with the "Justification of Rating." Lieutenant Cady similarly did not even mention this PD 62-E during the October 10, 2019 performance rating meeting he had with Sergeant Djossou. In fact, the PD 62-E for this and the body worn camera incident were created long after the fact, in order to justify the downgraded rating that Lieutenant Cady gave Sergeant Djossou.
- On May 14, 2020, after Sergeant Djossou submitted a rebuttal, the MPD Performance Rating Appeal Panel upgraded Sergeant Djossou's rating on seven out of the nine performance areas, so that her overall score went from 24 to 28. However, the Panel still kept her overall rating at 3 ("Meets Expectations"), which was downgraded from the 4 ("Exceeds Expectations") rating that she had received before her most recent whistleblower complaints.
- 62. On August 28, 2020, Captain Dustin Bellavance told Sergeant Djossou that Commander Randy Griffin directed him to issue a PD62-E to her for an alleged incident during the roll call on August 23, 2020. The PD62-E stated that that "There was a miscommunication between a member [Officer Daryl Caine] and the Sgt [Djossou] regarding what the expectations are of Crime patrol 404." This was false, as Sergeant Djossou did not conduct the roll call on

that day. Instead, the roll call on August 23 was conducted by Sergeant James Black at 8:30 p.m., and Sergeant Djossou did not start her shift until 10:30 p.m. The last time that Sergeant Djossou instructed Officer Caine on Crime patrol 404 was when she conducted the roll call on May 16, 2020, and at that time, he understood the scope of that assignment. This PD62-E is further retaliation, since it can be used as the basis for a downgraded performance evaluation or a step towards disciplinary action in the future.

- 63. On September 15, 2020, Sergeant Djossou met with Commander Griffin to appeal the PD62-E regarding the alleged roll call incident. She explained to him that she did not conduct the roll call on that day, and that Officer Caine already knew the details of Crime patrol 404, as she had previously instructed him on that specific assignment. Commander Griffin agreed with Sergeant Djossou, and wrote to Captain Bellavance, that same day, "Please retract the documentation of counseling."
- 64. Recently, MPD admitted that when the U.S. Attorney's Office had announced a new felon gun initiative to target persons with prior felony convictions who were now illegally possessing a gun (which is itself a felony), that this initiative was geographically targeted to MPD Districts 5, 6, and 7 which overlap with most of Council Wards 5 and 7 and all of Ward 8. These three Districts have the highest proportion of Black residents. Although MPD and the U.S. Attorney's Office had stated that this initiative would be enforced citywide, MPD was only enforcing it in those three Districts, which led to its targeting of Black residents. *See* S. Hsu & K. Alexander, "D.C. Crackdown on Gun Crime Targeted Black Wards, Was Not Enforced Citywide as Announced," *Washington Post* (Sept. 3, 2020). This targeting of Blacks is part of

<sup>1</sup> Online at: <a href="https://www.washingtonpost.com/local/legal-issues/dc-crackdown-on-gun-crime-targeted-black-wards-was-not-enforced-citywide-as-announced/2020/09/03/f6de0ce2-e933-11ea-970a-64c73a1c2392">https://www.washingtonpost.com/local/legal-issues/dc-crackdown-on-gun-crime-targeted-black-wards-was-not-enforced-citywide-as-announced/2020/09/03/f6de0ce2-e933-11ea-970a-64c73a1c2392</a> story.html

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the same pattern and practice of targeting Blacks that Sergeant Djossou protested when she challenged the use of "jump out" arrests in June 2015 and again in June 2018, and about which she testified to the D.C. Council in January 2020.

65. As a result of the racial targeting of Black residents, 32 federal prosecutors in D.C., all Black, submitted a 10-page memo to Acting U.S. Attorney Michael Sherwin, in which they protested the disproportionate targeting of Blacks through initiatives such as the felon gun initiative. These prosecutors also requested implicit bias training for prosecutors and a new focus on alternatives to incarceration. *See* K. Alexander, "32 Black Federal Prosecutors in Washington Have a Plan to Make the Criminal Justice System More Fair," *Washington Post* (Sept. 5, 2020).<sup>2</sup> The prosecutors' report has validated Sergeant Djossou's reports.

### COUNT I -

# DEPRIVATION OF PLAINTIFF'S RIGHTS UNDER THE DISTRICT OF COLUMBIA WHISTLEBLOWER PROTECTION ACT, <u>D.C. CODE ANN. § 1-615.51 et seq.</u>

- 66. Plaintiff incorporates as though fully restated herein each of the factual allegations in paragraphs 1 through 65, above.
- 67. The D.C. Whistleblower Protection Act, D.C. Code Ann. § 1-615.51 *et seq.*, prohibits the District of Columbia and its agencies, including MPD, from taking a prohibited personnel action, or otherwise retaliating against a District of Columbia employee because of the employee's protected disclosures made to any person, including but not limited to a supervisor, that the employee reasonably believes evidences gross mismanagement, gross misuse or waste of public resources or funds, abuse of authority in connection with the administration of a public program, or a violation of a federal, state, or local law, rule, or regulation.

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<sup>&</sup>lt;sup>2</sup> Online at: <a href="https://www.washingtonpost.com/local/public-safety/32-black-federal-prosecutors-in-washington-have-a-plan-to-make-the-criminal-justice-system-more-fair/2020/09/05/1774d646-ed4b-11ea-ab4e-581edb849379\_story.html">https://www.washingtonpost.com/local/public-safety/32-black-federal-prosecutors-in-washington-have-a-plan-to-make-the-criminal-justice-system-more-fair/2020/09/05/1774d646-ed4b-11ea-ab4e-581edb849379\_story.html</a>

- 68. Sergeant Djossou was an employee of the District of Columbia who held the rights guaranteed by the District of Columbia Whistleblower Protection Act to freely express her opinions on all public issues and to engage in protected disclosures as defined by the Act.
- 69. Sergeant Djossou's right to engage in protected disclosures and speak publicly on matters of public concern was clearly established under relevant law at all times relevant to this Complaint.
- Whistleblower Protection Act (1) in 2015 when she reported to MPD management the scheme to search young black men *en masse* in low-income neighborhoods without probable cause; (2) in 2018 when she reported to MPD management that officers intended to violate Body Worn Camera directives and the excessive force used by an officer in a traffic stop; (3) in 2019 when she reported to MPD management the improper downgrading of charges from felonies to misdemeanors; and (4) on January 16, 2020, when she testified to the D.C. Council. Sergeant Djossou, based on her training and experience, knew or had a reasonable belief that these disclosures all concerned illegal conduct by MPD.
- 71. Sergeant Djossou's protected disclosures evidenced gross mismanagement of MPD; gross misuse or waste of public funds; an abuse of authority in connection with the administration of MPD; a violation of District of Columbia and federal law; and a substantial and specific danger to the public safety.
- 72. Sergeant Djossou's protected disclosures led to MPD management's retaliation against her, including but not limited to the following:
- 73. In 2015, after Sergeant Djossou reported MPD's targeting men of color, MPD management excluded Sergeant Djossou from operations in the field, gave her a poor

performance evaluation, investigated her on a baseless disciplinary allegation, and excluded her from incidents involving arrests.

- 74. In June 8, 2018, after Sergeant Djossou reported officers being directed to violate Body Worn Camera directives and targeting young men of color in low-income neighborhoods, in violation of the Fourth Amendment to the U.S. Constitution and federal law, MPD management transferred her to Patrol Services North in the Fourth District, instead of the Detective-Sergeant position that Assistant Chief Newsham had promised her, and opened up two investigations of baseless disciplinary charges, both of which were eventually closed. The disciplinary investigations were intended to deter her from continuing to report illegal conduct at MPD.
- 75. In October 2019, after Sergeant Djossou reported the improper downgrading of felony charges to misdemeanor charges, for the personal economic interests of the MPD officers who did the downgrading, MPD gave her a poor performance evaluation in which her overall rating was downgraded from 4 (Exceeds Expectations) to 3 (Meets Expectations), and she received a 2 (Needs Improvement) in three of the nine performance dimensions. As part of the "justification" for that evaluation, Lieutenant Cady falsely claimed that she had been "counseled" for two performance issues in June of 2019, but neither counseling actually occurred.
- 76. On November 6, 2019, continuing to the present, after Sergeant Djossou reported the improper downgrading of felony charges to misdemeanors (in order to "improve" the crime statistics) to MPD management and MPD Internal Affairs, MPD again refused to transfer her to a position commensurate with her experience and performance, and had her work 8 days straight, from December 27, 2019 to January 3, 2020, while not assigning other officers at her rank to

similar arduous schedules, and issued a PD62-E with false accusations about her. After Sergeant Djossou testified to the D.C. Council on January 16, 2020, MPD further retaliated against her by giving her a false "Justification of Rating" on April 28, 2020 for the downgraded performance evaluation, and by retroactively issuing two back-dated PD62-E reports.

- 77. Defendant's retaliation against Sergeant Djossou, including the false disciplinary charges and the unjustified downgrading of her performance evaluation, were intended to deter her from continuing to report illegal conduct, and to force her to resign from MPD.
- 78. Defendant's retaliation against Sergeant Djossou has stopped her advancement in MPD, which has led to economic damages, loss of benefits, and emotional distress and public humiliation.
- 79. Defendant's continuing retaliation against Sergeant Djossou will continue to cause her economic injury and emotional distress damages.
- 80. By retaliating against Sergeant Djossou for her disclosures, Defendant exhibited an extreme reckless disregard of, and callous indifference to, her rights under the D.C. Whistleblower Protection Act. Defendant's actions described above were in willful and wanton disregard of plaintiff's rights, and taken in order specifically to injure her for her disclosures of MPD's gross mismanagement, abuse of authority, and illegal actions.

### **Requested Relief**

**NOW WHEREFORE** plaintiff prays this court to order the following:

1. Award plaintiff compensatory and consequential damages to redress injuries suffered as a result of the denial of promotions and transfers and the downgraded evaluations, including back pay for lost wages and lost benefits, and front pay for denial of plaintiff's expected future earnings, in an amount appropriate to the proof presented at trial;

- 2. Award plaintiff compensatory and consequential damages for defendant's violation of plaintiff's rights secured under the District of Columbia Whistleblower Protection Act, in an amount appropriate to the proof presented at trial;
- 3. Award plaintiff her attorneys' fees and costs incurred in bringing this action pursuant to D.C. Code § 1-615.54(a)(1)(G);
- 4. Issue a declaratory judgment declaring that defendant violated plaintiff's statutory rights;
- 5. Issue an injunction transferring plaintiff into a Detective-Sergeant position in the MPD, into which she would have been transferred but for the retaliation against her as a result of her disclosures of illegal conduct; and
  - 6. Grant such other relief as this court deems just and necessary.

Respectfully submitted,

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DATED: October 9, 2020

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

CHARLOTTE DJOSSOU	)
Plaintiff,	) Civil Action No. <u>2020 C</u> A 004292 B
<b>V.</b>	) Jury Demand
DISTRICT OF COLUMBIA	
Defendant.	

### **JURY DEMAND**

Plaintiff Charlotte Djossou, through undersigned counsel, demands a jury trial on all claims so triable.

Respectfully submitted,

Lynne Bernabei, D.C. Bar No. 938936

Lynne Bernabei/Au

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DATED: October 9, 2020

# **Superior Court of the District of Columbia**

### CIVIL DIVISION- CIVIL ACTIONS BRANCH

### INFORMATION SHEET

Charlotte Djossou	Case Number: <b>2020 CA 004292 B</b>
vs	Date: October 9, 2020
District of Columbia	One of the defendants is being sued in their official capacity.
Name: (Please Print) Lynne Bernabei	Relationship to Lawsuit
Firm Name: Bernabei & Kabat, PLLC  Telephone No.: Six digit Unified Bar No. 202-745-1942 (x 232)	✓ Attorney for Plaintiff  ☐ Self (Pro Se)
TYPE OF CASE: Non-Jury 6 Per Demand: \$_over \$25,000	son Jury
PENDING CASE(S) RELATED TO THE ACTION E Case No.: Judge:	
Case No.: Judge:	Calendar#:
NATURE OF SUIT: (Check One Box Only)	
A. CONTRACTS COLI	LECTION CASES
☐ 02 Breach of Warranty ☐ 17 OVER \$25 ☐ 06 Negotiable Instrument ☐ 27 Insurance/S ☐ 07 Personal Property ☐ 07 Insurance/S ☐ 13 Employment Discrimination ☐ 07 Insurance/S ☐ Under \$25,0 ☐ 28 Motion to C	00 Pltf. Grants Consent Over \$25,000 Consent Denied
B. PROPERTY TORTS	
☐ 01 Automobile ☐ 03 Destruction ☐ 02 Conversion ☐ 04 Property Da ☐ 07 Shoplifting, D.C. Code § 27-102 (a)	of Private Property
C. PERSONAL TORTS	
	ander Not Malpractice)  Interference 18Wrongful Death (Not Malpractice)  Prosecution 19 Wrongful Eviction  Legal 20 Friendly Suit  dical (Including Wrongful Death) 21 Asbestos  (Not Automobile, 22 Toxic/Mass Torts

SEE REVERSE SIDE AND CHECK HERE

IF USED

## Information Sheet, Continued

C. OTHERS  O1 Accounting O2 Att. Before Judgment O5 Ejectment O9 Special Writ/Warrants (DC Code § 11-941) I0 Traffic Adjudication I1 Writ of Replevin I2 Enforce Mechanics Lien I6 Declaratory Judgment	☐ 17 Merit Personnel Act (OEA) (D.C. Code Title 1, Chapter 6) ☐ 18 Product Liability ☐ 24 Application to Confirm, Modify, Vacate Arbitration Award (DC Code ☐ 29 Merit Personnel Act (OHR) ☐ 31 Housing Code Regulations ☐ 32 Qui Tam ☐ 33 Whistleblower	ະ § 16-44() ()
II.  O3 Change of Name  O6 Foreign Judgment/Domestic  O8 Foreign Judgment/Internation  13 Correction of Birth Certificate  14 Correction of Marriage  Certificate  26 Petition for Civil Asset Forfe  27 Petition for Civil Asset Forfe  28 Petition for Civil Asset Forfe	e 2-1802.03 (h) or 32-151 9 (a)]  20 Master Meter (D.C. Code §  42-3301, et seq.)  iture (Vehicle)	☐ 21 Petition for Subpoens [Rule 28-1 (b)] ☐ 22 Release Mechanics Lien ☐ 23 Rule 27(a)(1) (Perpetuate Testimony) ☐ 24 Petition for Structured Settlement ☐ 25 Petition for Liquidation
D. REAL PROPERTY	al Sale 🔲 31 Tax Lien Bid Off Certifica	t Denied
Attorney's Signatu	enabelai	October 9, 2020



### 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

Charlotte Djossou

Dla	intiff
r ia.	nun

VS.

Case Number **2020 CA 004292 B** 

District of Columbia

Defendant

#### **SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Lynne Bernabei		Clerk of the Court
Name of Plaintiff's Attorney		
Bernabei & Kabat PLLC, 1400 - 16th Street NW # 500	Ву	San W. B.
Address Washington, D.C. 20036-2223	-	Deputy Clerk
202-745-1942 (x 232)	Date	10/09/2020
Telephone		

如需翻译,请打电话 (202) 879-4828

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

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

번역을 원하시면,(202)879-4828*표* 전화주실세요 - የአማርኛ ትርጉም ለማግኘት (202)879-4828 - ይደውሉ

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

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) 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

CV-3110 [Rev. June 2017] Super. Ct. Civ. R. 4





### 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:		
citatorio, excluyendo el día mismo de la en agente del Gobierno de los Estados Unido sesenta (60) días, contados después que us enviarle por correo una copia de su Conte	os de Norteamérica o del Gobie sted haya recibido este citatorio,	rno del Distrito de Columbia, tiene usted para entregar su Contestación. Tiene que
A usted también se le require prese Indiana Avenue, N.W., entre las 8:30 a.m. y los sábados. Usted puede presentar la Co demandante una copia de la Contestación o usted incumple con presentar una Contesta	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo es	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si
A usted también se le require prese Indiana Avenue, N.W., entre las 8:30 a.m. y los sábados. Usted puede presentar la Co demandante una copia de la Contestación o usted incumple con presentar una Contesta	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo omanda.	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si
abogado aparecen al final de este documento copia de la Contestación por correo a la dire  A usted también se le require presentante la Regional de la Contestación o la Contestación de la Contestación d	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo emanda.  SECRE	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si en rebeldía contra usted para que se haga
A usted también se le require prese Indiana Avenue, N.W., entre las 8:30 a.m. y los sábados. Usted puede presentar la Codemandante una copia de la Contestación o usted incumple con presentar una Contesta efectivo el desagravio que se busca en la der	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo omanda.	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si en rebeldía contra usted para que se haga TARIO DEL TRIBUNAL
A usted también se le require press Indiana Avenue, N.W., entre las 8:30 a.m. y los sábados. Usted puede presentar la Co demandante una copia de la Contestación o usted incumple con presentar una Contesta efectivo el desagravio que se busca en la der	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo emanda.  SECRE	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si en rebeldía contra usted para que se haga
A usted también se le require prese Indiana Avenue, N.W., entre las 8:30 a.m. y los sábados. Usted puede presentar la Co demandante una copia de la Contestación o usted incumple con presentar una Contesta efectivo el desagravio que se busca en la der lombre del abogado del Demandante	entar la Contestación original a 5:00 p.m., de lunes a viernes o contestación original ante el Jue en el plazo de siete (7) días de ación, podría dictarse un fallo emanda.  SECRE	gado, tiene que enviarle al demandante una io.  Tribunal en la Oficina 5000, sito en 500 entre las 9:00 a.m. y las 12:00 del mediodía ez ya sea antes que usted le entregue al haberle hecho la entrega al demandante. Si en rebeldía contra usted para que se haga TARIO DEL TRIBUNAL

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 pedirayuda al respecto.

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

CV-3110 [Rev. June 2017] Super. Ct. Civ. R. 4



#### 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

Vs.
DISTRICT OF COLUMBIA

C.A. No.

2020 CA 004292 B

### **INITIAL ORDER AND ADDENDUM**

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

- (1) This case is assigned to the judge and calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption.
- (2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of (a) the summons, (b) the complaint, and (c) this Initial Order and Addendum. 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(m).
- (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 remote hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients <u>before</u> 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 <u>once</u>, with the consent of all parties, to either of the two succeeding Fridays. 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 of the conference will be granted except upon motion for good cause shown.

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

Chief Judge Anita M. Josey-Herring

Case Assigned to: Judge YVONNE WILLIAMS

Date: October 9, 2020

Initial Conference: REMOTE HEARING - DO NOT COME TO COURTHOUSE SEE REMOTE HEARING INSTRUCTIONS ATTACHED TO INITIAL ORDER

9:30 am, Friday, January 08, 2021

Location: Courtroom 518

500 Indiana Avenue N.W. WASHINGTON, DC 20001

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

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

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at https://www:dccourts.gov/pa/. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. D.C. Code § 16-2825 Two separate Early Mediation Forms are available. Both forms may be obtained at www.dccourts.gov/medmalmediation. One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to earlymedmal@dcsc.gov. Unrepresented plaintiffs who elect not to eFile must either mail the form to the Multi-Door Dispute Resolution Office at, Suite 2900, 410 E Street, N.W., Washington, DC 20001, or deliver if in person if the Office is open for in-person visits.

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

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

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code§ 16-2826. Any Plaintiff who is unrepresented may mail the form to the Civil Actions Branch at [address] or deliver it in person if the Branch is open for in-person visits. The forms to be used for early mediation reports are available at www.dccourts.gov/medmalmediation.

Chief Judge Anita M. Josey-Herring

### **Civil Remote Hearing Instructions for Participants**

The following instructions are for participants who are scheduled to have cases heard before a Civil Judge in a **Remote Courtroom** 

#### Option1: (AUDIO ONLY/Dial-in by Phone):

Toll 1 (844) 992-4762 or (202) 860-2110, enter the Meeting ID from the attachment followed by #, press again to enter session.

Please call in no sooner than 5 minutes before your scheduled hearing time. Once you have joined the session, please place your phone on mute until directed otherwise. If you should happen to get disconnected from the call, please call back in using the phone number and access number provided and the courtroom clerk will mute your call until the appropriate time.

If you select Option 2 or Option 3 use the Audio Alternative

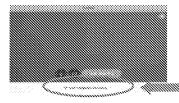
#### Option 2: (LAPTOP/ DESKTOP USERS 1):

Open Web Browser in Google Chrome and copy and paste following address from the next page: https://dccourts.webex.com/meet/XXXXXXXXX

### Option 3: (LAPTOP/ DESKTOP USERS 2):

Open Web Browser in Google Chrome and copy and paste following address https://dccourts.webex.com | Select Join, enter the Meeting ID from the next page

AUDIO ALTERNATIVE: Instead of automatically using USE COMPUTER FOR AUDIO, select CALLIN and follow the CALL-IN prompt window. Use a cell phone or desk phone. You will be heard clearer if you do not place your phone on SPEAKER. It is very important that you enter the ACCESS ID # so that your audio is matched with your video.



#### Option 4: (Ipad/SMART PHONE/TABLET):

- Go to App Store, Download WebEx App (Cisco WebEx Meetings)
- Sign into the App with your Name and Email Address
- Select Join Meeting
- Enter address from the next page: https://dccourts.webex.com/meet/XXXXXXXXX
- Click join and make sure your microphone is muted and your video is unmuted (if you need to be
- seen). If you only need to speak and do not need to be seen, use the audio only option.
- When you are ready click "Join Meeting". If the host has not yet started the meeting, you will be placed in the lobby until the meeting begins.

For Technical Questions or issues Call: (202) 879-1928, Option #2

### Superior Court of the District of Columbia Public Access for Remote Court Hearings (Effective August 24, 2020)

The current telephone numbers for all remote hearings are: 202-860-2110 (local) or 844-992-4726 (toll free). After dialing the number, enter the WebEx Meeting ID as shown below for the courtroom. Please click a WebEx Direct URL link below to join the hearing online.

Audio and video recording; taking pictures of remote hearings; and sharing the live or recorded remote hearing by rebroadcasting, live-streaming or otherwise are not allowed

Division Courtroom	Types of Hearings	Public Access via WebEx			
		Scheduled in Courtroom	WebEx Direct URL	WebEx Meeting ID	
Auditor	206	Auditor Master	https://dccourts.webex.com/meet/ctbaudmaster	129 648 5606	
Master		Hearings			
	100	Civil 2 Scheduling	https://dccourts.webex.com/meet/ctb100	129 846 4145	
		Conferences; Status,			
		Motion and Evidentiary			
Civil		Hearings including Bench Trials			
	205	Foreclosure Matters	https://dccourts.webex.com/meet/ctb205	129 814 7399	
	212	Civil 2 Scheduling	https://dccourts.webex.com/meet/ctb212	129 440 9070	
		Conferences; Status,			
		Motion and Evidentiary			
		Hearings including Bench Trials			
	214	Title 47 Tax Liens; and	https://dccourts.webex.com/meet/ctb214	129 942 2620	
		Foreclosure Hearings			
	219	Civil 2 Scheduling	https://dccourts.webex.com/meet/ctb219	129 315 2924	
		Conferences; Status,			
		Motion and Evidentiary			
		Hearings including			
	224	Bench Trials	Line (1) and the contract of t	420 400 5460	
	221	Civil 1 Scheduling	https://dccourts.webex.com/meet/ctb221	129 493 5162	
		Conferences; Status, Motion and Evidentiary			
		Hearings including			
		Bench Trials			
	318	Civil 2 Scheduling	https://dccourts.webex.com/meet/ctb318	129 801 7169	
		Conferences; Status,			
	320	Motion and Evidentiary	https://dccourts.webex.com/meet/ctb320	129 226 9879	
		Hearings including			
		Bench Trials			

400	Judge in Chambers Matters including Temporary Restraining Orders, Preliminary Injunctions and Name Changes	https://dccourts.webex.com/meet/ctb400	129 339 7379
415	Civil 2 Scheduling	https://dccourts.webex.com/meet/ctb415	129 314 3475
516	Conferences; Status,	https://dccourts.webex.com/meet/ctb516	129 776 4396
517	Motion and Evidentiary Hearings including	https://dccourts.webex.com/meet/ctb517	129 911 6415
518	Bench Trials	https://dccourts.webex.com/meet/ctb518	129 685 3445
519		https://dccourts.webex.com/meet/ctb519	129 705 0412
JM-4		https://dccourts.webex.com/meet/ctbjm4	129 797 7557
A-47	Housing Conditions Matters	https://dccourts.webex.com/meet/ctba47	129 906 2065
B-52	Debt Collection and Landlord and Tenant Trials	https://dccourts.webex.com/meet/ctbb52	129 793 4102
B-53	Landlord and Tenant Matters including Lease Violation Hearings and Post Judgment Motions	https://dccourts.webex.com/meet/ctbb53	129 913 3728
B-109	Landlord and Tenant Matters	https://dccourts.webex.com/meet/ctbb109	129 127 9276
B-119	Small Claims Hearings and Trials	https://dccourts.webex.com/meet/ctbb119	129 230 4882