

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

DISTRICT OF COLUMBIA,
a municipal corporation
441 4th Street, N.W.
Washington, D.C. 20001,

PLAINTIFF,

v.

TURNING NATURAL INC.
7748 Marlboro Pike
Forestville, MD 20747

Serve on:

JERRI EVANS
Registered Agent
375 Chaplin Street S.E.
Washington, D.C. 20019

and

JERRI EVANS
375 Chaplin Street S.E.
Washington, D.C. 20019

DEFENDANTS.

Case No.:

Judge:

JURY TRIAL DEMANDED

COMPLAINT

This is a lawsuit to enforce the District of Columbia's (District's) minimum wage, overtime, and sick leave laws. The law in the District establishes straightforward minimum wage, overtime, and sick leave rules that employers are required to follow if they choose to do business here. These laws are fundamental—they protect our most vulnerable workers and ensure that, at the very least, an honest day's work is met with honest pay. Defendants, who operate two cafes in the District with plans to open a third, have flouted these basic requirements.

In expanding their business, they have cheated their own employees, routinely and systemically denying them the minimum wage, overtime, and sick leave they are owed. The District therefore brings this action on behalf of current and former employees of Defendants to recover the wages they are owed; the District also seeks to recover all applicable penalties for violations of District law.

JURISDICTION

1. This Court has subject matter jurisdiction over this civil action pursuant to D.C. Code § 11-921(a).

2. This Court has personal jurisdiction over Defendants due to their transaction of business in the District of Columbia, pursuant to D.C. Code § 13-423(a)(1).

PARTIES

3. Plaintiff the District of Columbia (District) is a municipal corporation empowered to sue and be sued, and is the local government for the territory constituting the permanent seat of the federal government. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District, and is responsible for upholding the public interest.

4. Defendant Turning Natural Inc. is a Maryland corporation that operates cafes branded under the “Turning Natural” name that sell fruit and vegetable juices, as well as various prepared health foods. Turning Natural currently operates two stores in the District of Columbia, and one in Maryland.

5. Defendant Jerri Evans is the Owner and Chief Executive Officer of Defendant Turning Natural. At all relevant times, Defendant Evans has transacted business in the District of

Columbia by managing and operating the two Turning Natural stores in the District. At all relevant times, Defendant Evans had the authority to control the conduct of Defendant Turning Natural that violated the District's minimum wage, overtime, and sick leave laws.

FACTS

6. Defendants currently operate three Turning Natural stores. Two of these stores are in the District of Columbia—one at 1380 H Street N.E., Washington, D.C. 20002 (in Capitol Hill) and the other at 2025 Martin Luther King Jr. Avenue S.E., Washington, D.C. 20020 (in Anacostia). The third store is located in Maryland, at 7748 Marlboro Pike, District Heights, MD 20747.

7. Defendants appear to be expanding their business in the near future. According to Turning Natural's website (www.turningnatural.com), two new Turning Natural stores are "coming soon." One of these is planned to open in the District's Shaw neighborhood, at 1933 9th Street N.W., Washington, D.C. 20032. The other is set to open in Maryland at the MGM National Harbor, 101 National Ave., Oxon Hill, MD 20745.

8. Each Turning Natural store is staffed by approximately 5-6 employees on a given day. Store employees are generally tasked with a variety of responsibilities relating to store management, including managing the cashier, preparing juices and food, serving customers, stocking inventory, and cleaning up after closing.

9. From approximately August 2016 through July 2017, Turning Natural failed to pay minimum wage, overtime, or both to at least Onesha Barnes, Shavon Jackson, and Brandi Jackson, whose claims are discussed in more detail below. On information and belief, the denial of minimum wage and overtime is systemic at the company, and multiple former and current

employees were and are denied minimum wage and overtime pay. Throughout this time period, Turning Natural also failed to provide its employees with paid sick leave.

Onesha Barnes

10. Onesha Barnes worked at Turning Natural from approximately March through October 2017, where she worked exclusively at the Capitol Hill store.

11. Defendant Evans hired Ms. Barnes to work as a Shift Leader. As a Shift Leader, Ms. Barnes was responsible for being the first employee to arrive at the store and prepare for the day's opening. Once open, Ms. Barnes performed a variety of responsibilities, including stocking inventory, managing the cashier, preparing juices and food, serving customers, and cleaning up after closing.

12. Ms. Barnes's hourly wage throughout her time as a Turning Natural employee was \$11.50/hour.

13. On July 1, 2017, the District's minimum wage increased from \$11.50/hour to \$12.50/hour. (*See* D.C. Code § 32-1003(5)(A)(i)-(ii).) Despite the increase in the District's minimum wage, Ms. Barnes's hourly wage remained at \$11.50/hour.

14. In approximately August 2017, Ms. Barnes confronted Defendant Evans in person about her hourly wage. Ms. Barnes pointed out that other Turning Natural employees were making \$12.50/hour, and she believed that she should be similarly paid due to her hard work. Ms. Evans rebuffed this request, and declined to raise Ms. Barnes's wages.

15. In October 2017, Ms. Barnes was working her shift at the Capitol Hill store. While on her shift, she was approached by Defendant Evans's partner, who exercises managerial authority at Turning Natural stores. Defendant Evans's partner approached Ms. Barnes because

he was displeased with the manner in which she was preparing the food and beverages, and verbally berated her in front of the store's other employees.

16. Following this episode, Ms. Barnes informed Defendant Evans that she could not complete a whole shift. Defendant Evans reprimanded Ms. Barnes, stating that she had to give notice before missing part of a shift. After this exchange, Defendant Evans stopped staffing Ms. Barnes to work shifts, effectively terminating her.

17. Ms. Barnes's pay stubs covering pay periods between July 3, 2017 and October 16, 2017 reflect that she was paid an hourly wage of \$11.50, which was below the District's operative minimum wage of \$12.50. During this time, Ms. Barnes worked at least 335.45 hours at the sub-minimum wage rate.

18. In addition to flouting the District's minimum wage laws, Defendants exhibited additional behaviors that created a hostile work environment. For example, Ms. Barnes was forced to deal with several workplace hazards—she often saw rats when she arrived to open the store, and the store's refrigerator contained a loose wire that caused moderate electrocution upon contact. Ms. Barnes reported both of these issues to Defendant Evans, but was met with indifference and told to “work around” the issues. Defendants did not remedy either workplace hazard.

19. Throughout her time of employment at Turning Natural, Ms. Barnes did not receive any hours of paid sick leave.

Shavon Jackson

20. Shavon Jackson worked at the Turning Natural Anacostia location from approximately August 2015 through August 2016.

21. Defendant Evans hired Ms. Shavon Jackson to work as a Barista. As a Barista, Ms. Shavon Jackson was responsible for a variety of tasks relating to store management, such as stocking inventory, managing the cashier, preparing juices and food, serving customers, and cleaning up after closing.

22. Ms. Shavon Jackson's hourly wage throughout her time as a Turning Natural employee was \$10.50/hour.

23. On July 1, 2016, the District's minimum wage increased from \$10.50/hour to \$11.50/hour. (*See* D.C. Code § 32-1003(4), (5)(A)(i).) Despite the increase in the District's minimum wage, Ms. Shavon Jackson's hourly wage remained at \$10.50/hour.

24. In approximately July 2016, Ms. Shavon Jackson confronted Defendant Evans in person at the Anacostia store. Ms. Shavon Jackson asked Defendant Evans whether she was eligible for the District's minimum wage of \$11.50. Defendant Evans responded that she would not pay Ms. Shavon Jackson the District's minimum wage.

25. In August 2016, Ms. Shavon Jackson received a letter from Defendant Evans informing her that she was terminated.

26. Ms. Shavon Jackson's pay stubs covering pay periods between July 1, 2016 and August 24, 2016 reflect that she was paid an hourly wage of \$10.50, which was below the District's operative minimum wage of \$11.50. During this time, Ms. Shavon Jackson worked at least 272.21 hours at the sub-minimum wage rate.

27. In addition, Ms. Shavon Jackson's pay stubs covering pay periods between February 25, 2016 and July 15, 2016 reflect that she was never paid overtime rates for hours worked in excess of a forty-hour workweek. During this time, Ms. Shavon Jackson worked at least 24.43 hours in excess of a forty-hour workweek without overtime pay.

28. Throughout her time of employment at Turning Natural, Ms. Shavon Jackson did not receive any hours of paid sick leave.

Brandi Jackson

29. Brandi Jackson (no relation to Shavon Jackson) worked at Turning Natural from approximately July 2016 through September 2016. Ms. Brandi Jackson initially worked at Turning Natural's Maryland location, but in mid-July 2016, she was staffed at the Anacostia store.

30. Defendant Evans hired Ms. Brandi Jackson to work as a Barista. As a Barista, Ms. Brandi Jackson was responsible for a variety of tasks relating to store management, such as stocking inventory, managing the cashier, preparing juices and food, serving customers, and cleaning up after closing.

31. Ms. Brandi Jackson's hourly wage throughout her time as a Turning Natural employee was \$10.50/hour. This was below the District's minimum wage, which increased to \$11.50 on July 1, 2016. (*See* D.C. Code § 32-1003(5)(A)(i).)

32. Ms. Brandi Jackson worked at least thirty hours per week throughout her time of employment at Turning Natural. At no point was she paid the District's lawful minimum wage for her hours worked.

33. Ms. Brandi Jackson also routinely worked hours in excess of a forty-hour workweek, but was never paid an overtime rate for those hours.

34. In approximately August 2016, Ms. Brandi Jackson confronted Defendant Evans on two separate occasions regarding the failure to pay minimum wage and overtime. With respect to overtime, Defendant Evans told Ms. Brandi Jackson that she did not have to pay overtime due to a "small business loophole." With respect to minimum wage, Defendant Evans

declined to raise Ms. Brandi Jackson's wages, and instead reassigned her to work at the Maryland store in late August 2016.

35. In approximately September 2016, while on her shift at the Maryland store, Ms. Brandi Jackson was approached by Defendant Evans's partner. Defendant Evans's partner was displeased with the way she made a smoothie, and ordered her to remake the smoothie five times, verbally berating her and humiliating her in front of her fellow employees and customers. Shortly thereafter, Ms. Brandi Jackson emailed Defendant Evans providing her with notice that she was resigning from the company, citing her partner's behavior and the company's minimum wage and overtime violations.

36. Throughout her time of employment at Turning Natural, Ms. Brandi Jackson did not receive any hours of paid sick leave.

The District's Investigation

37. In August 2016, the District of Columbia Department of Employment Services (DOES) received an anonymous complaint that Defendants were failing to pay their employees the District's minimum wage.

38. DOES commenced an investigation, and corresponded with Defendants regarding the production of documents. While Defendant Evans made initial productions of payroll documents, Defendants later became entirely unresponsive to follow-up correspondence from DOES.

39. On September 12, 2017, DOES issued an Administrative Order that determined that Defendant Turning Natural failed to pay minimum wage to Shavon Jackson and two additional employees of Defendants not named in this Complaint. The Administrative Order found these employees were also paid sub-minimum wages of \$10.50 between July 2016 through

August 2016. The Administrative Order also found that these employees were not paid overtime rates for hours worked in excess of a forty-hour workweek between February 2016 through September 2016.

40. Defendants did not respond to the Administrative Order. Having heard no response from Defendants, DOES referred the Administrative Order to the Office of the Attorney General (OAG) for enforcement in October 2017.

41. OAG initially attempted to contact Defendants by phone and mail in order to resolve the matter, but was met with no response. OAG subsequently issued a subpoena demanding the production of documents to Defendant Turning Natural and a subpoena to testify at a deposition to Defendant Evans. The subpoenas were personally served on Defendant Evans on January 19, 2018.

42. The deadline for production to OAG's subpoena for production for documents was February 28, 2018. This deadline passed with no response or communication from Defendants.

43. On March 15, 2018, OAG and Defendant Evans spoke by telephone. On the call, the parties agreed to extend the production deadline to April 6, 2018, and agreed to postpone the deposition of Defendant Evans pending document production.

44. On April 4, 2018, following a request from Defendant Evans for a deadline extension to produce the requested documents, OAG agreed to an April 26, 2018 production deadline. This was memorialized in an email sent by OAG on April 4, 2018.

45. Since the April 4, 2018 correspondence, OAG has attempted to contact Defendants by phone and email regarding the outstanding production, but Defendants have been entirely unresponsive.

CLAIMS FOR RELIEF

Count One: Violation of the Minimum Wage Revision Act (against all Defendants)

46. The District re-alleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

47. At all relevant times, Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employees who were denied the District's minimum wage or overtime wages for hours worked in excess of a forty-hour workweek were "employees" of Defendants as defined by the Minimum Wage Revision Act. D.C. Code § 32-1002(2).

48. At all relevant times, Defendants were "employers" who employed Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employees who were denied minimum wage and overtime wages for hours worked in excess of a forty-hour workweek, as defined by the Minimum Wage Revision Act. D.C. Code § 32-1002(3).

49. At all relevant times, Defendant Evans controlled, or had the ability to control, Defendant Turning Natural's conduct alleged in the Complaint to violate the District's Minimum Wage Revision Act. As such, at all relevant times, Defendant Evans was also an individual violating the Minimum Wage Revision Act or is otherwise liable for Defendant Turning Natural's violation of the Minimum Wage Revision Act.

50. At all relevant times, the Minimum Wage Revision Act required Defendants to pay a statutorily specified minimum wage to Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employee, which increased on a yearly basis. D.C. Code § 32-1003(4)-(5).

51. Defendants routinely and systemically failed to pay minimum wage to Onesha Barnes, Shavon Jackson, Brandi Jackson, and other Turning Natural employees who worked at Turning Natural stores in the District of Columbia.

52. At all relevant times, the Minimum Wage Revision Act required Defendants to pay overtime wages of at least 1.5 times their regular wages to Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employee, for hours worked in excess of a forty-hour workweek in the District of Columbia. D.C. Code § 32-1003(c).

53. Defendants routinely and systemically failed to pay overtime wages to Onesha Barnes, Shavon Jackson, Brandi Jackson, and other Turning Natural employees who worked hours in excess of a forty-hour workweek in the District of Columbia.

54. Defendants who violate the Minimum Wage Revision Act are liable to their employees for the amount of unpaid wages, statutory penalties, and liquidated damages equal to treble the amount of unpaid wages. D.C. Code § 32-1012(b)(1).

55. Under the Minimum Wage Revision Act, Defendants convicted of willfully or negligently violating the Minimum Wage Revision Act are subject to a fine of up to \$10,000.00. D.C. Code § 32-1011(a). The Minimum Wage Revision Act also authorizes administrative penalties of \$50 for each affected employee for each day that the violation occurred or continued. D.C. Code § 32-1011(d)(1)(A).

56. The Attorney General is authorized to bring a civil action in the Superior Court against employers who violate the Minimum Wage Revision Act for “restitution or for injunctive, compensatory, or other authorized relief.” D.C. Code § 32-1306(a)(2)(A).

57. The District brings this claim for relief against Defendants to recover damages, liquidated damages, and penalties for violations of the Minimum Wage Revision Act in an amount to be proven at trial.

Count Two: Violation of the Sick and Safe Leave Act (against all Defendants)

58. The District re-alleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

59. At all relevant times, Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employees who were denied sick leave were “employees” of Defendants as defined by the Sick and Safe Leave Act. D.C. Code § 32-531.01(2).

60. At all relevant times, Defendants were “employers” who employed Onesha Barnes, Shavon Jackson, Brandi Jackson, and any other Turning Natural employees who were denied sick leave, as defined by the Sick and Safe Leave Act. D.C. Code § 32-531.01(3)(A).

61. At all relevant times, Defendant Evans controlled, or had the ability to control, Defendant Turning Natural’s conduct alleged in the Complaint to violate the District’s Sick and Safe Leave Act. As such, at all relevant times, Defendant Evans was also an individual violating the Sick and Safe Leave Act or is otherwise liable for Defendant Turning Natural’s violation of the Sick and Safe Leave Act.

62. At all relevant times, the Sick and Safe Leave Act required Defendants to provide Onesha Barnes, Shavon Jackson, Brandi Jackson, and all other Turning Natural employees, specified hours of paid sick leave in accordance with their hours worked, which depended on Turning Natural’s total number of employees. *See* D.C. Code § 32-531.02(a).

63. Defendants failed to provide any paid sick leave hours whatsoever to Onesha Barnes, Shavon Jackson, Brandi Jackson, and other Turning Natural employees throughout their time of employment at Turning Natural.

64. Under the Sick and Safe Leave Act, Defendants who fail to allow employees to use paid sick leave are liable for \$500 in damages to affected employees for each accrued day

denied, regardless of whether the employee takes unpaid leave or reports to work on that day.

D.C. Code § 32-531.12(b).

65. Defendants who willfully violate the Sick and Safe Leave Act are subject to civil penalties for each affected employee of \$1,000 for the first offense, \$1,500 for the second offense, and \$2,000 for the third and each subsequent offense. D.C. Code § 32-531.12(c).

66. The Attorney General is authorized to bring a civil action in the Superior Court against employers who violate the Sick and Safe Leave Act for “restitution or for injunctive, compensatory, or other authorized relief.” D.C. Code § 32-1306(a)(2)(A).

67. The District brings this claim for relief against Defendants to recover damages, liquidated damages, and penalties for violations of the Sick and Safe Leave Act in an amount to be proven at trial.

REQUESTED RELIEF

WHEREFORE, the District of Columbia respectfully requests:

68. A declaratory judgment that Defendants’ failure to pay minimum wage and overtime constitutes a violation of the Minimum Wage Revision Act, and an injunction against Defendants enjoining further violations of the Minimum Wage Revision Act;

69. An award of back wages against Defendants due to their failure to pay minimum wage and overtime in violation of the Minimum Wage Revision Act, in an amount to be proven at trial;

70. An award of liquidated damages against Defendants due to their failure to pay minimum wage and overtime in violation of the Minimum Wage Revision Act, in an amount to be proven at trial;

71. Statutory penalties against Defendants, as authorized by the Minimum Wage Revision Act, in an amount to be proven at trial;

72. A declaratory judgment that Defendants' failure to provide sick leave constitutes a violation of the Sick and Safe Leave Act, and an injunction against Defendants enjoining further violations of the Sick and Safe Leave Act;

73. An award of damages against Defendants for their failure to provide sick leave, as authorized by the Sick and Safe Leave Act, in an amount to be proven at trial;

74. Statutory penalties against Defendants, as authorized by the Sick and Safe Leave Act, in an amount to be proven at trial;

75. An award of costs and reasonable attorneys' fees, as authorized by D.C. Code § 32-1306(a)(2)(A)(i);

76. Such other and further relief as this Court deems just and proper.

JURY DEMAND


The District demands a jury trial on all issues triable of right by a jury in this matter.

Dated: June 29, 2018

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ROBYN R. BENDER
Deputy Attorney General
Public Advocacy Division



JIMMY R. ROCK [493521]
Assistant Deputy Attorney General
Public Advocacy Division


(CONTINUES)

/s/ Jane H. Lewis

JANE H. LEWIS [198130]
Section Chief, Housing and Community Justice
Public Advocacy Division

/s/ Alacoque Hinga Nevitt

ALACOQUE HINGA NEVITT¹
Assistant Attorney General



RANDOLPH T. CHEN [1032644]
Assistant Attorney General

441 4th Street, N.W.
Washington, D.C. 20001
(202) 442-9854 (Phone)
(202) 730-0623 (Fax)
randolph.chen@dc.gov
alacoque.nevitt@dc.gov

Attorneys for the District of Columbia

¹ Admitted to the Bar of the Commonwealth of Pennsylvania and the States of California and New Jersey, and practicing in the District pursuant to D.C. Ct. App. Rule 49(c)(4) under the supervision of Deputy Attorney General Robyn R. Bender.

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

District of Columbia _____

Case Number: _____

vs

Date: June 29, 2018

Turning Natural, Inc. and Jerri Evans

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

Name: <i>(Please Print)</i> Randolph T. Chen, Assistant Attorney General	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff
Firm Name: Office of the Attorney General for the District of Columbia	<input type="checkbox"/> Self (Pro Se)
Telephone No.: _____ Six digit Unified Bar No.: _____ 202-442-9854 1032644	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$Restitution and civil penalties Other: Injunctive relief

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

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

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

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

A. CONTRACTS

COLLECTION CASES

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

B. PROPERTY TORTS

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

C. PERSONAL TORTS

- | | | |
|--|---|---|
| <input type="checkbox"/> 01 Abuse of Process
<input type="checkbox"/> 02 Alienation of Affection
<input type="checkbox"/> 03 Assault and Battery
<input type="checkbox"/> 04 Automobile- Personal Injury
<input type="checkbox"/> 05 Deceit (Misrepresentation)
<input type="checkbox"/> 06 False Accusation
<input type="checkbox"/> 07 False Arrest
<input type="checkbox"/> 08 Fraud | <input type="checkbox"/> 10 Invasion of Privacy
<input type="checkbox"/> 11 Libel and Slander
<input type="checkbox"/> 12 Malicious Interference
<input type="checkbox"/> 13 Malicious Prosecution
<input type="checkbox"/> 14 Malpractice Legal
<input type="checkbox"/> 15 Malpractice Medical (including Wrongful Death)
<input type="checkbox"/> 16 Negligence- (Not Automobile, Not Malpractice) | <input type="checkbox"/> 17 Personal Injury- (Not Automobile, Not Malpractice)
<input type="checkbox"/> 18 Wrongful Death (Not Malpractice)
<input type="checkbox"/> 19 Wrongful Eviction
<input type="checkbox"/> 20 Friendly Suit
<input type="checkbox"/> 21 Asbestos
<input type="checkbox"/> 22 Toxic/Mass Torts
<input type="checkbox"/> 23 Tobacco
<input type="checkbox"/> 24 Lead Paint |
|--|---|---|

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

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

II.

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

D. REAL PROPERTY

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



Attorney's Signature

June 29, 2018

Date



**Superior Court of the District of Columbia
CIVIL DIVISION
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone: (202) 879-1133**

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S

Plaintiff

Washington, DC 20001 vs.

Case Number _____

Turning Natural Inc.

7748 Marlboro Pike

Defendant

Forestville, MD 20747

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 (20) 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 party 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 five (5) 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.

Randolph T. Chen Assistant Attorney General
Name of Plaintiff's Attorney

Clerk of the Court

Office of the Attorney General for DC

Address 441 4th Street, NW, Suite 630 South

Washington, DC. 20001

Telephone (202) 442-9854

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 원하시면, (202) 879-4828 로 전화하십시오

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



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Teléfono: (202) 879-1133

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S Demandante
 contra
Washington, DC 20001

Número de Caso: _____

Turning Natural, Inc.
7748 Marlboro Pike Demandado
Forestville, MD 20747

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 veinte (20) 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 cinco (5) 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.

Randolph T. Chen, Assistant Attorney General
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for DC
 Dirección 441 4th Street, NW, Suite 630 South
Washington, DC. 20001
(202) 442-9854
 Teléfono

Por: _____
 Subsecretario

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Đê có một bài dịch, hãy gọi (202) 879-4828
 번역을 원하시면, (202) 879-4828 로 전화하십시오 የአማርኛ 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, PODRÍAN RETENERLE SUS INGRESOS, O PODRÍAN TOMAR SUS BIENES PERSONALES O RAÍCES Y VENDERLOS 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 afrontar el costo de 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 de 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
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Telephone: (202) 879-1133**

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S

Plaintiff

Washington, DC 20001 vs.

Case Number _____

Jerri Evans

375 Chaplin Street SE

Defendant

Washington, DC 20019

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 (20) 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 party 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 five (5) 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.

Randolph T. Chen Assistant Attorney General
Name of Plaintiff's Attorney

Clerk of the Court

Office of the Attorney General for DC

Address 441 4th Street, NW, Suite 630 South

Washington, DC. 20001

(202) 442-9854

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 원하시면, (202) 879-4828 로 전화하십시오 የኮግሮኛ 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



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
500 Indiana Avenue, N.W., Suite 5000
Washington, D.C. 20001 Teléfono: (202) 879-1133

DISTRICT OF COLUMBIA

441 4th Street, NW, Suite 630S
 Washington, DC 20001

Demandante

Jerri Evans

375 Chaplin Street SE
 Washington, DC 20019

Demandado

Número de Caso: _____

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veinte (20) 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 cinco (5) 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.

Randolph T. Chen, Assistant Attorney General
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

Office of the Attorney General for DC
 Dirección 441 4th Street, NW, Suite 630 South
 Washington, DC. 20001
 Teléfono (202) 442-9854

Por: _____
 Subsecretario

Fecha _____

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 원하시면, (202) 879-4828 로 전화하십시오 የአማርኛ 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, PODRÍAN RETENERLE SUS INGRESOS, O PODRÍAN TOMAR SUS BIENES PERSONALES O RAÍCES Y VENDERLOS 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 afrontar el costo de 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 de otros lugares donde puede pedir ayuda al respecto.

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