## SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

THE DISTRICT OF COLUMBIA, :

:

Plaintiff, : Case No. 2013 CA 4228 B

: Calendar 12

v. : Judge Brian F. Holeman

: Closed Case

PEACEOHOLICS, INC., et al.,

:

**Defendants.** :

## ORDER OF JUDGMENT BY CONSENT

Upon consideration of the Order of April 5, 2016, it is on this 5<sup>th</sup> day of April 2016, hereby

**ORDERED**, that Consent Judgment is entered in favor Plaintiff The District of Columbia (the "District") and against Defendant Ronald L. Moten under the following terms:

- 1. Ronald L. Moten agrees to entry of this Consent Judgment without any admission of liability or wrongdoing;
- 2. Ronald L. Moten shall be liable to the District in the amount of ten thousand dollars (\$10,000.00) without post-judgment interest, provided that Ronald L. Moten (a) makes a payment of two hundred dollars (\$200.00) towards satisfaction of this Consent Judgment by the fifteenth (15<sup>th</sup>) day of the month following the date of the Court's entry of this Consent Judgment, and (b) thereafter makes a payment of two hundred dollars (\$200.00) towards satisfaction of this Consent Judgment by the fifteenth (15<sup>th</sup>) day of each month, until this Consent Judgment is paid in full, then any unpaid balance of this Consent Judgment shall not be subject to collection. The District's agreement to collect the amount owed under this Consent Judgment as described in this paragraph is subject to the provisions of Paragraphs 10 and 11 of this Consent Judgment;

3. Any additional payments by Ronald L. Moten in excess of the monthly payments of

two hundred dollars (\$200.00) shall be credited toward the remaining balance of this Consent

Judgment;

4. Ronald L. Moten shall not manage or control the finances or financial staff of a

nonprofit organization incorporated in or conducting business in the District of Columbia.

Further, Ronald L. Moten shall neither have authority to disburse the funds of such an

organization nor disburse such funds;

5. If Ronald L. Moten founds, forms, incorporates, or serves as an officer, trustee,

director, or manager, or in a managerial role (regardless of his formal title or position, if any), of

a nonprofit organization that requests, receives or uses District grant funds, then Ronald L.

Moten shall notify the District in writing of the name and address of the organization and his

position and role, no later than ten (10) days after Ronald L. Moten accepts the position or forms

the organization;

6. The requirements of Paragraphs 5 and 6 shall be in effect for five (5) years from the

date this Consent Judgment is entered by the Court;

7. Any deadlines for payment(s) or notification(s) under this Consent Judgment may be

extended by the District in writing at its sole discretion;

8. Ronald L. Moten shall mail (i) all payments, made payable to "D.C. Treasurer" and

postmarked by the fifteenth (15<sup>th</sup>) day of the month, and (ii) all notifications, to the District at the

following address:

**Public Interest Division** 

Attn: Deputy Attorney General

Office of the Attorney General for the District of Columbia

441 Fourth Street, N.W., Suite 600-S

Washington, D.C. 20001

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9. This settlement is premised upon the completeness and accuracy of sworn personal

financial statements that Ronald L. Moten provided to the District on February 16, 2016. If the

Court determines that these sworn statements materially understate Ronald L. Moten's personal

assets or his ability to pay any judgment, then the District may petition the Court to vacate this

Consent Judgment and allow the District to proceed with its claims in this case;

10. In the event Ronald L. Moten misses a deadline for payment or makes or causes to be

made material misrepresentations in any of the notifications required by this Consent Judgment,

the District may seek relief from the Court to make the full amount owed under this Consent

Judgment immediately due and owing and to obtain any equitable relief that the Court deems just

and proper;

11. This Consent Judgment resolves the claims brought by the Office of the Attorney

General against Ronald L. Moten in this action, as set out in the District's Complaint;

12. Each party shall bear its own legal and other costs incurred in connection with this

matter; and

13. This Court retains jurisdiction over this matter to construe and enforce the terms of

this Consent Judgment.

BRIAN F. HOLEMAN JUDGE

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## Copies e-served to:

Bennett Rushkoff, Esquire Catherine A. Jackson, Esquire District of Columbia Office of the Attorney General 441 4<sup>th</sup> Street, N.W. Suite 600-South Washington, D.C. 20001 Counsel for Plaintiff

Johnny Barnes, Esquire 301 G Street, S.W. Suite B101 Washington, D.C. 20024 Counsel for Defendant Ronald Moten

## Copies mailed to:

Jauhar Abraham 227 Mississippi Avenue, SE Apt. 101 Washington, DC 20020 Defendant

Peaceoholics, Inc. c/o Jauhar Abraham 10611 Quaking Aspen Way Clinton, MD 20735 Defendant