

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

DISTRICT OF COLUMBIA

a municipal corporation,
441 4th Street, NW
Washington, D.C. 20001

Plaintiff,

v.

POLYMER80, INC.

a Nevada corporation
134 Lakes Blvd.
Dayton, Nevada 89403-8804

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

**COMPLAINT FOR VIOLATIONS OF THE
CONSUMER PROTECTION PROCEDURES ACT**

Plaintiff District of Columbia (“District”), by and through its Attorney General, brings this action against Defendant Polymer80, Inc. (“Polymer80” or “Defendant”) for violations of the District’s Consumer Protection Procedures Act (“CPPA”), D.C. Code § 28-3901, *et seq.* In support of its claims, the District states as follows:

Introduction

1. Defendant Polymer80 misleadingly advertises and, on information and belief, sells and provides illegal firearms to District consumers. Through a website and a network of dealers, Polymer80 sells a variety of almost complete firearms, including AR-15 semi-automatic rifles and several handguns, that consumers can easily finish at home. These products, which lack identifying information such as serial numbers, are untraceable and are commonly known as “Ghost Guns.” Ghost Guns are increasingly used to commit crimes in the District, with

Polymer80's products constituting 83.2% of the Ghost Guns recovered by District law enforcement since 2017.

2. Polymer80 tells consumers, including those in the District, that they can legally purchase and possess its products because the guns are no more than 80% complete, and thus do not reach the necessary state of manufacturing to constitute a firearm under federal law.

3. However, Polymer80's core products – lower receivers for rifles and handgun frames – are firearms under District law. Because Polymer80's lower receivers and frames are firearms, they are illegal for District consumers to possess without being registered. Upon receipt, any District consumer that possesses a Polymer80 Ghost Gun is in violation of District law. Polymer80 violates several other gun laws in the District, including selling firearms without a dealer's license, selling firearms that are categorically banned under District law, and selling firearms without required identifying information. Through this action, the District seeks to stop Polymer80 from misleadingly advertising and selling its illegal Ghost Guns as legal products to District consumers.

Jurisdiction

4. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code §§ 11-921 and 28-3909.

5. This Court has personal jurisdiction over Defendant pursuant to D.C. Code § 13-423(a). Polymer80 has advertised, offered, sold and provided consumer goods to District residents.

Parties

6. Plaintiff District of Columbia, a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government of the United States. 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. D.C. Code § 1-301.81(a)(1). The Attorney General is specifically authorized to enforce the District's consumer protection laws, including the CPPA, pursuant to D.C. Code § 28-3909.

7. Defendant Polymer80, Inc. is a Nevada-based corporation engaged in the business of advertising, offering, selling, and providing firearms. Polymer80 was incorporated in December 2014 and, since that time, has advertised, offered and, on information and belief, sold and provided firearms to D.C. consumers, both directly and indirectly, via, among other means, the website www.polymer80.com.

The District's Relevant Gun Laws

8. The District of Columbia imposes a series of restrictions and requirements on both businesses and individuals related to the sale and possession of firearms.

9. The District's Firearm Control Regulations Act of 1975 ("FCRA"), defines a firearm as "any weapon, regardless of operability, which will, or is designed or redesigned, made or remade, **readily converted**, restored, or repaired, or is intended to, expel a projectile or projectiles by the action of an explosive; the frame or receiver of any such device; or any firearm muffler or silencer [.]" D.C. Code § 7-2501.01(9) (emphasis added).

10. Under the same law, "no person or organization in the District shall possess or control any firearm, unless the person or organization holds a valid registration certificate for the firearm." D.C. Code § 7-2502.1.

11. In order to "engage in the business of selling, purchasing, or repairing any firearm, destructive device, parts therefor, or ammunition," a person or organization must obtain a dealer's license. Dealer's licenses are unavailable to those who "engage in the business of

selling, purchasing, or repairing firearms which are unregistrable” because they are illegal under D.C. law. *See* D.C. Code § 7–2504.01(b); § 7-2502.02.

12. Illegal firearms in the District include, among other categories, handguns that are not validly registered to the current registrant and “assault weapon[s].” D.C. Code § 7-2502.02. Under the statute, assault weapons include the “Colt AR-15 series,” and an extensive list of other prohibited semi-automatic weapons, shotguns with revolving cylinders, and any firearm that the Chief of Police designates as an assault weapon by rule. D.C. Code § 7–2501.01(3A)(A). All models within a series, even those with minor differences and those constructed by a different manufacturer, are prohibited.

13. Merchants are prohibited from offering or selling firearms which lack a unique manufacturer’s number or serial number, or a unique dealer’s identification number, impeded into the metal portion of each firearm. D.C. Code § 7–2504.08.

14. District law also imposes mandatory waiting periods on firearm purchases. Specifically, it prohibits sellers from delivering firearms to purchasers in the District unless 10 days have elapsed from the date of purchase. D.C. Code § 22-4508.

Polymer80’s Misleading Advertisements and Illegal Sales of Firearms

15. Polymer80 advertises and sells a variety of weapons via its website that can be readily made into fully operational firearms. Polymer80 also sells its firearms through a network of dealers that consumers can access through Polymer80’s website.

16. On its website, Polymer80 claims that these weapons, which include an AR-15 semi-automatic rifle, a .308 semi-automatic rifle, and at least seven types of handguns, are no more than 80% complete. Consumers can purchase the lower receivers of rifles or handgun frames, along with other materials – generally, the trigger, barrel, and firing pin, all of which are

available, if in stock, on Polymer80's website – needed to complete the receivers and handgun frames into fully functional firearms. The consumers then receive those materials via mail.

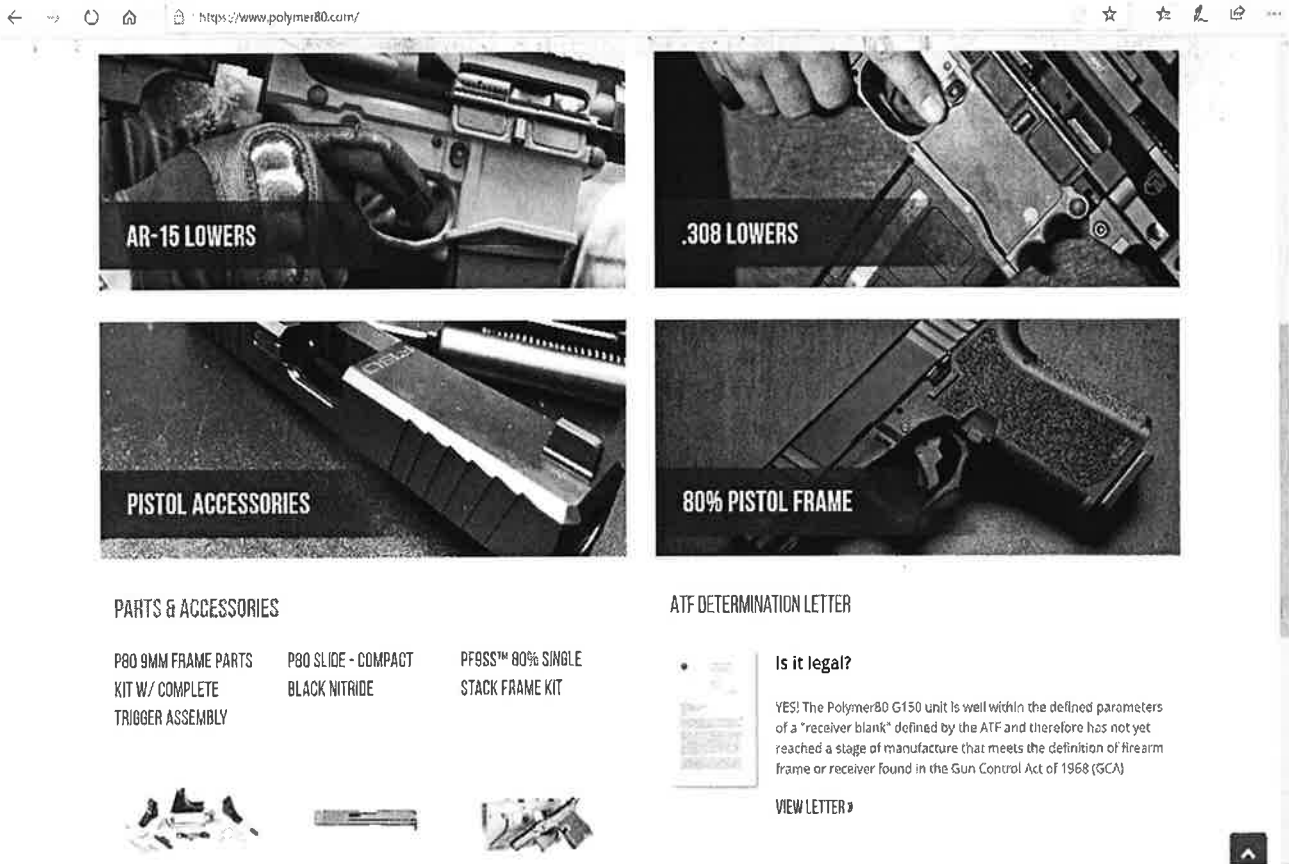
17. To further facilitate the ease of completing its firearms, Polymer80 offers, “Buy, Build, Shoot” kits which “contain[] all the necessary components to build [two different] complete pistol[s].” The website states that these kits include an “80% frame kit, complete slide assembly, complete frame parts kit, 10 round magazine and a pistol case.”

18. Consumers can then follow Polymer 80's written step-by-step instructions online, often accompanied by supplemental videos, to finish both the pistols and the semi-automatic rifles in a matter of hours.

19. All of Polymer80's lower receivers and handgun frames lack a unique manufacturer's number, serial number, or a unique dealer's identification number, making these guns untraceable “Ghost Guns.”

20. Polymer80 tells consumers at multiple places on its website that because the lower receivers and handgun frames it sells are supposedly no more than 80% complete, they can be legally sold, distributed, and possessed.

21. For instance, the Polymer80 website's homepage, copied below, asks, “Is it legal?” and responds unequivocally, “YES!” This statement would lead a reasonable District consumer to believe that Polymer80's handguns are legal for them to purchase and possess.



22. To establish the purported legality of all its products, Polymer80 links to a determination letter from the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) to Polymer80 regarding just one of its products, the AR-15 lower receiver. The letter states that the AR-15 lower receiver is not a “firearm” under federal law because it has not reached the necessary state of manufacturing under the federal Gun Control Act of 1968. Polymer80’s website provides no similar letter establishing the legality, under federal law or elsewhere, of the other firearms it sells. Polymer80 also provides no information regarding the legality of its products under District law.

23. Polymer80 has advertised its products to District consumers without restriction or warning as to their legality on its website since as early as December 2014.

24. Polymer80 products are also available through its “Dealers,” at least 48 in total, which consumers can access through Polymer80’s website.

25. Polymer80 advertises, and, on information and belief, sells, both directly and through its Dealers, lower receivers and handgun frames to District consumers. These products are “firearms” as defined by District law.

26. It is illegal for any District consumer to possess one of Polymer80’s firearms because those products lack a valid registration certificate, as required by D.C. Code § 7-2502.01.

27. Polymer80’s lower receivers and pistol frames are also illegal to possess in the District because they lack a unique manufacturer’s number or serial number, or a unique dealer’s identification number, impeded into the metal portion of each firearm, as required by D.C. Code § 7-2504.08.

28. On information and belief, Polymer80 engages in the business of selling firearms to District consumers without a dealer’s license, in violation of D.C. Code § 7-2504.01(b).

29. On information and belief, Polymer80 does not adhere to the mandatory waiting period on firearm purchases, in that it does not wait to deliver firearms for a minimum of ten days from the date of purchase, in violation of D.C. Code § 22-4508.

30. Polymer80 makes no mention on its website that its products are illegal under District law or that District consumers cannot lawfully possess its products. Rather, its assertion of legality, based solely on an ATF determination letter regarding a single product, has the tendency to mislead District consumers that Polymer80 can legally sell these products to District consumers, and that it is legal for District consumers to possess these products in the District.

Polymer 80's Illegal Ghost Guns Contribute to the District's Gun Violence

31. Polymer80's Ghost Guns threaten the health and safety of District residents. The prevalence of these firearms in the District has rapidly increased over the past four years.

32. Prior to 2016, the Metropolitan Police Department ("MPD") had never recovered a Ghost Gun in the District. In 2017, MPD recovered three Ghost Guns. In 2018, that number rose to 25, and then nearly quintupled, to 116, in 2019. Three of the Ghost Guns recovered in 2019 were involved in murders.

33. That trend has continued this year. As of May 29, 2020, MPD has recovered 106 Ghost Guns. At that rate, the number of Ghost Guns recovered in 2020 would more than double the number recovered in 2019.

34. According to information from the District's Department of Forensic Sciences, of the 250 Ghost Guns recovered in D.C. between 2017 and May 29, 2020, at least 208, or 83.2%, were manufactured by Polymer80.

COUNT ONE

Defendant's Misrepresentations and Omissions in Violation of the Consumer Protection Procedures Act

35. The District re-alleges the allegations set forth in the paragraphs above as though fully set forth herein.

36. The CPPA is a remedial statute that is to be construed broadly. It establishes a right to truthful information from merchants about consumer goods and services that are or would be purchased or received in the District of Columbia.

37. The CPPA prohibits a wide variety of unfair and deceptive business practices. Such practices are unlawful regardless of whether any consumer is in fact misled, deceived, or damaged.

38. District consumers seek out or purchase Defendant's firearm products for personal, household or family purposes, and those products are therefore consumer goods and services.

39. Defendant, through the ordinary course of its business, offers to sell or supply its products to District consumers for personal, household or family purposes. As such, Defendant is a merchant under the CPPA.

40. Defendant is also a merchant because it is connected with the supply-side of consumer transactions carried out by Defendant's Dealers.

41. Merchants who violate the CPPA may be subject to restitution, damages, civil penalties, temporary or permanent injunctions, the costs of the action, and reasonable attorneys' fees. D.C. Code § 28-3909.

42. The CPPA prohibits any merchant from engaging in unfair and deceptive trade practices, including by:

- a. "represent[ing] that goods or services have a source, sponsorship, approval, certification, accessories, characteristics, ingredients, uses, benefits, or quantities that they do not have," D.C. Code §28-3904(b);
- b. "misrepresent[ing] as to a material fact which has a tendency to mislead," D.C. Code §28-3904(e);
- c. "[r]epresent[ing] that a transaction confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law. D.C. Code § 28-3904(e-1); and
- d. "fail[ing] to state a material fact if such failure tends to mislead," D.C. Code §28-3904(f).

43. In advertising and selling its firearms to District consumers, Defendant expressly and by implication represents that its products are legal in the District. This is a representation that its products have an approval that they do not have and is an unfair and deceptive trade practice prohibited by the CPPA. D.C. Code § 28-3904(a).

44. In advertising and selling its firearms to District consumers, Defendant expressly and by implication misrepresents (1) that it can lawfully offer, sell, and provide its firearms in the District; (2) that its unlawful firearms do not need to include legally required serial numbers or other identifying information; and (3) that it is lawful for a District consumer to possess Polymer80 lower receivers and pistol frames in the District. These, and other actions, are each misrepresentations of material facts which tend to mislead District consumers and are therefore unfair and deceptive trade practices prohibited by the CPPA. D.C. Code § 28-3904(e).

45. In advertising and selling its firearms to District consumers, Defendant expressly and by implication represents that its products are legal in the District, which they are not. This is a representation that its transactions are not prohibited by law and is an unfair and deceptive trade practice prohibited by D.C. Code § 28-3904(e-1).

46. In advertising and selling its firearms to District consumers, Defendant fails to disclose (1) that it does not possess a commercial license to sell firearms in the District; (2) that its unlawful firearms also fail to include legally required serial numbers or other identifying information; and (3) that it is unlawful for a D.C. consumer to possess an unlicensed firearm in the District, including Defendant's lower receivers and pistol frames. These, and other actions, are each failures to state material facts which tend to mislead D.C. consumers, and are therefore unfair and deceptive trade practices prohibited by the CPPA. D.C. Code § 28-3904(f).

COUNT TWO
Violations of the District's Gun Laws in
Violation of the Consumer Protection Procedures Act

47. The District re-alleges the allegations set forth in the paragraphs above as though fully set forth herein.

48. A merchant that violates another District law in the context of carrying out a consumer transaction engages in an unfair and deceptive trade practice prohibited by the CPPA.

49. Such unfair and deceptive trade practices violate the CPPA regardless of whether merchants subjectively believe they are violating other District laws.

50. Defendant's actions violated, and continue to violate, several provisions of the FCRA and other gun-related statutes, including, upon information and belief: selling firearms to District consumers without a dealer's license; selling legally prohibited assault weapons to district consumers; offering or selling firearms which lack unique identifying information or serial numbers; and failing to adhere to the mandatory 10-day waiting period. D.C. Code §§ 7-2504.01; 7-2502.02; 7-2504.08; 22-4508.

51. Defendant violated the CPPA each time it sold a firearm to a District consumer, either directly or through its Dealers, that violated District gun laws, regardless of whether they subjectively understood that they were engaging in unlawful activity.

Prayer for Relief

Wherefore, Plaintiff the District of Columbia, pursuant to D.C. Code § 28-3909, requests that the Court:

- A. Enter a preliminary and/or permanent injunction to prevent future violations of the CPPA by Defendant;

- B. Award such relief as the Court finds necessary to redress injury to consumers resulting from Defendant's violations of the CPPA, including awarding restitution or disgorging profit from Defendant' based on their unlawful conduct;
- C. Award civil penalties in an amount up to the statutory maximum for each violation of the CPPA, pursuant to D.C. Code § 28-3909(b); and
- D. Award the District the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Jury Demand

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

Respectfully submitted,

Dated: June 24, 2020

KARL A. RACINE
Attorney General for the District of Columbia

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

/s/ Jimmy Rock
JIMMY ROCK [493521]
Assistant Deputy Attorney General
Public Advocacy Division

/s/ Benjamin M. Wiseman
BENJAMIN M. WISEMAN [1005442]
Director, Office of Consumer Protection
Public Advocacy Division

/s/ Brendan B. Downes
BRENDAN B. DOWNES [187888]

/s/ Christopher Pascual
CHRISTOPHER PASCUAL [1657168]
Assistant Attorneys General
Public Advocacy Division
441 4th Street, N.W., Suite 630 South
Washington, D.C. 20001
(202) 805-7515 | brendan.downes@dc.gov
(202) 914-8768 | christopher.pascual@dc.gov

Attorneys for the District of Columbia



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

District of Columbia, a municipal corporation _____
Plaintiff

vs.

Polymer80, Inc.
 SERVE: David L. Borges, Registered Agent
 340 Freeport Blvd. #3,4,5
 Sparks, NV 89703 USA _____
Defendant

Case Number _____

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.

Brendan B. Downes, AAG
 Name of Plaintiff's Attorney
D.C. Office of the Attorney General
 Address
441 4th Street NW, Suite 630 S Washington DC 20001
(202) 805-8515
 Telephone

Clerk of the Court

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) 879-4828로 전화주세요 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**

**Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

District of Columbia, a municipal corporation _____

Demandante

POLYMER80, Inc. contra
SERVE: David L. Borges, Registered Agent
340 Freeport Blvd. #3,4,5
Sparks, NV 89703

Número de Caso: _____

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Brendan B. Downes, AAG

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

441 4th Street NW 630S

Por: _____
Subsecretario

Dirección

Washington, D.C. 20001

(202) 805-8515

Fecha _____

Teléfono

如需翻译, 请打电话 (202) 879-4828

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

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

번역이 필요하시면 (202) 879-4828 로 전화주세요

የአገልግሎት ገዢው ለማግኘት (202) 879-4828 ይደውሉ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

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

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

District of Columbia

Case Number: _____

vs

Date: June 24, 2020

Polymer80, Inc.

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

Name: <i>(Please Print)</i> Brendan B. Downes	Relationship to Lawsuit
Firm Name: D.C. Office of the Attorney General	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: (202) 805-8515 Six digit Unified Bar No.: 187888	<input type="checkbox"/> Self (Pro Se)
	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ Penalties & Costs as awarded Other: Preliminary/Permanent Injunction

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

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

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

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

A. CONTRACTS

COLLECTION CASES

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

B. PROPERTY TORTS

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

C. PERSONAL TORTS

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

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

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

II.

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

D. REAL PROPERTY

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

/s/ Brendan B. Downes

Attorney's Signature

6/24/2020

Date