

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

<p>DISTRICT OF COLUMBIA, A MUNICIPAL CORPORATION, 400 6th Street, NW Washington, DC 20001,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>ANDREW JERRY KIRKLAND, 401 Warfield Drive, Apt. 4032 Hyattsville, MD 20785,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No. <u>2025-CAB-008344</u></p>
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COMPLAINT

The District of Columbia (the District) brings this action against Defendant Andrew Jerry Kirkland under the Strengthening Traffic Enforcement, Education, and Responsibility Amendment Act of 2024, D.C. Code § 50-2201.04(g)(1) (STEER Act), and the Delinquent Debt Recovery Act, D.C. Code § 1-350.06(a)(6), for numerous traffic citations—many for dangerous and unsafe driving offenses—totaling \$30,000 in unpaid fines, penalties, and fees owed to the District of Columbia. In support of its claims, the District states as follows:

INTRODUCTION

1. Defendant Andrew Jerry Kirkland’s dangerous and unsafe driving is a threat to public safety. From February 2013 through June 2024, Defendant Kirkland amassed 98 citations for traffic infractions across his Florida driver’s license and five Maryland license plates, the majority for excessive speeding and other unsafe driving in the District.

2. Ninety of Defendant Kirkland’s 98 citations are for speeding. Of those 90 speeding tickets, 57 are for driving 11-15 miles per hour over the speed limit, and 25 are for driving 16-20 miles per hour over the speed limit. Eight of the 90 speeding tickets are for driving

speeds that would constitute reckless driving, or driving 20 miles per hour or more over the speed limit. D.C. Code § 50-2201.04(b)(1).

3. Rather than pay the thousands of dollars in tickets he has amassed over the years, Defendant Kirkland has acted as if there are no consequences for his lawlessness. At this point, he owes the District \$30,000 in unpaid fines, penalties, and fees for his unsafe driving.

4. The District brings this action to hold Defendant Kirkland accountable for his long history of unsafe driving, collect the money he owes the District, and ensure that he stops endangering others and threatening public safety.

JURISDICTION

5. This Court has subject matter jurisdiction under D.C. Code § 11-921(a) and D.C. Code § 50-2201.04(g)(1)(A).

6. This Court has personal jurisdiction over Defendant Kirkland under D.C. Code § 50-2201.04(g)(1)(A), because Defendant Kirkland or an authorized driver was driving Defendant Kirkland's vehicles in the District when the underlying traffic citations occurred. *See District of Columbia v. ExxonMobil Oil Corp.*, 172 A.3d 412, 424 (D.C. 2017) (noting that a government is injured when its laws are violated).

PARTIES

7. Plaintiff the 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 conducts the District's legal business and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1).

8. Defendant Andrew Jerry Kirkland resides at 401 Warfield Drive, Apt. 4032, Hyattsville, MD 20785.

9. Defendant Kirkland is the sole registered owner of vehicles with five Maryland license plates on which he owes debt.

10. Defendant Kirkland held a Florida driver's license.

11. Defendant Kirkland received numerous traffic citations in the District on each of his license plates and Florida driver's license that have accumulated fines, penalties, and fees because of his nonpayment.

**THE DEPARTMENT OF MOTOR VEHICLES AND THE CENTRAL
COLLECTION UNIT'S TRAFFIC INFRACTION DEBT COLLECTION PROCESS**

12. The District of Columbia's Department of Motor Vehicles (DMV) manages the process for collecting traffic fines and adjudicating traffic violations. D.C. Code § 50-904(1)(A).

13. The District issues a Notice of Infraction for violations of traffic laws and regulations. D.C. Code § 50-2303.03. A Notice of Infraction may be issued by either a law enforcement officer or an automated traffic enforcement system.¹ 18 DCMR § 3003.1; D.C. Code § 50-2209.01(a).

14. The owner of a vehicle issued a Notice of Infraction is liable for payment of the fine assessed for the infraction. D.C. Code § 50-2209.02.

¹ An automated traffic system is "equipment that takes a film or digital camera-based photograph which is linked with a violation detection system that synchronizes the taking of a photograph with the occurrence of a traffic infraction." D.C. Code §§ 50-2209.01(a), 2303.02a(a).

15. An individual who receives a Notice of Infraction may answer it by: (1) paying the fine; (2) admitting the infraction with an explanation; or (3) denying the infraction. D.C. Code §§ 50-2302.05(a), 2303.04(a)(1).

16. A civil fine for a traffic infraction varies based on the established amount for the offense. D.C. Code § 50-2301.05(a)(1); *see, e.g.*, 18 DCMR §§ 2600, 2601.

17. A penalty equal to the civil fine is imposed on an individual who fails to answer a Notice of Infraction within 30 calendar days of the notice issuance date. D.C. Code §§ 50-2302.05(d), 2303.05(d)(1).

18. If an individual fails to answer a Notice of Infraction within 60 calendar days, the traffic infraction will be deemed admitted, and all fines and penalties will be assessed. D.C. Code §§ 50-2302.05(e), 2303.05(d)(2).

19. An individual may apply to vacate an admission within 60 calendar days of the deemed admission date by providing a sufficient defense to the traffic violation and an excusable reason for the delay in answering the traffic violation.² D.C. Code §§ 50-2302.05(i)(1), 2303.05(f).

20. After 120 days from the notice issuance, the DMV may refer debt arising from unpaid traffic infractions to the Office of the Chief Financial Officer (OCFO) Central Collection Unit (CCU) for collection. D.C. Code § 1-350.02(a). Included in the DMV's referrals are both tickets that were not adjudicated and tickets that were adjudicated but where liability was found.

² For a traffic violation detected by an automated traffic enforcement device, an individual may apply to vacate a deemed admission within one year of the date of admission by providing a defense that he or she was not the owner or lessee of the vehicle involved or that the license plates were stolen at the time of the violation. D.C. Code §§ 50-2302.05(i)(3), 2303.05(g).

21. CCU is a component of the OCFO. CCU was established under the Delinquent Debt Recovery Act. D.C. Code § 1-350.01(1). It is responsible for collecting delinquent debt owed to the District.³ D.C. Code § 1-350.02(a).

22. CCU imposes a 20 percent collection fee to debt owed from an unpaid traffic ticket. *See* D.C. Code § 1-350.03; *Central Collection Unit Fee*, District of Columbia OCFO, https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/CCU%20Fee_Assignment.pdf (last visited Feb. 5, 2025).

23. The DMV and CCU use an electronic Ticketing Information Management System (eTIMS) to facilitate referrals. This system stores all traffic tickets issued by, among other agencies, the District of Columbia Department of Public Works (DPW), the District of Columbia Department of Transportation (DDOT), and the Metropolitan Police Department (MPD). Tickets stored in eTIMS include, but are not limited to, moving violations ticketed by an officer, violations captured by an automated traffic enforcement system, and parking violations.

24. eTIMS consolidates all traffic infractions under the associated driver's license number and license plate. For each driver's license and license plate, eTIMS captures: (1) the ticket number; (2) the status of the ticket; (3) the violation date and time; (4) the violation code and description; (5) the make of the vehicle; (6) the location of the violation and disposition of the ticket; (7) the fine amount; (8) the penalty; and (9) the total amount due.

25. CCU contracts with Harris & Harris, Ltd. (Harris & Harris), a third-party collection agency, to collect delinquent debt owed to the District. Harris & Harris communicates with debtors in the form of letters and phone calls to collect delinquent debt. Harris & Harris

³ Delinquent debt is “[a]ny financial obligation owed by a person to a District agency that remains unpaid more than 90 days after it was due.” D.C. Code § 1-350.01(2)(A).




uses an electronic database that captures every attempt made to collect debt and every communication sent to or received from a debtor. The system also captures the total debt in collections, which includes all fines, penalties, and fees.

DEFENDANT KIRKLAND’S OUTSTANDING TRAFFIC INFRACTIONS

26. CCU conducted an eTIMS search of Defendant Kirkland’s traffic infractions associated with his driver’s license and the license plates registered in his name.

27. Defendant Kirkland holds Florida driver’s license **K624010853790**, on which he owes debt. He is the registered owner of five Maryland license plates on which he owes debt: **1DM8595, 8BL6354, 2AY5347, 435700T, and 1FJ5877.**

28. The District issued the following traffic tickets to Defendant Kirkland under Florida driver’s license **K624010853790**:

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
7017704676	 UNPAID 10/08/2014	10/08/2014 09:03PM	T711 OPER. UNRS. VEHICLE	MAZD	300 8TH ST SE BLOCK N/B 013:DEEMED LIABLE	\$500.00	\$700.00	\$1200.00
7017704654	 UNPAID 10/08/2014	10/08/2014 08:56PM	T591 CELL PHNE OTH DEVICE	MAZD	300 8TH ST SE BLOCK N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
7017704665	 UNPAID 10/08/2014	10/08/2014 09:02PM	T333 FL TO DISP INSURANCE	MAZD	300 8TH ST SE BLOCK N/B 013:DEEMED LIABLE	\$30.00	\$42.00	\$72.00

29. DMV records currently reflect that Defendant Kirkland has three delinquent traffic tickets issued to his driver’s license, totaling \$1,512.

30. Defendant Kirkland failed to answer and thus was deemed liable for all associated fines, penalties, and fees for these traffic infractions.

31. The District issued the following traffic tickets to Defendant Kirkland under Maryland license plate **1DM8595**:

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F156874574	UNPAID 03/26/2023	03/26/2023 07:26PM	T120 SPEED 16-20 OVR LIMT	INFI	3900 BLK E CAPITOL ST SE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F156713675	UNPAID 03/25/2023	03/25/2023 01:17AM	T119 SPEED 11-15 OVR LIMT	INFI	600 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F155234896	UNPAID 02/14/2023	02/14/2023 06:10PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F154848337	UNPAID 02/05/2023	02/05/2023 11:37AM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F154811735	UNPAID 02/04/2023	02/04/2023 02:14PM	T121 SPEED 21-25 OVR LIMT	INFI	2600 BLK LINCOLN RD NE N/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F154575678	UNPAID 01/29/2023	01/29/2023 12:27AM	T119 SPEED 11-15 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F154482442	UNPAID 01/26/2023	01/26/2023 08:39PM	T119 SPEED 11-15 OVR LIMT	INFI	UNIT BLK FLORIDA AVE NW SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F154282235	UNPAID 01/21/2023	01/21/2023 11:33PM	T119 SPEED 11-15 OVR LIMT	INFI	UNIT BLK FLORIDA AVE NW SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F153535949	UNPAID 12/31/2022	12/31/2022 12:14AM	T823 OVER 25 MPH NON CONT	INFI	3900 BLK E CAPITOL ST SE E/B 013:DEEMED LIABLE	\$500.00	\$700.00	\$1200.00
F152359665	UNPAID 11/21/2022	11/21/2022 07:48PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F150683291	UNPAID 10/01/2022	10/01/2022 10:27AM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F150020262	UNPAID 09/11/2022	09/11/2022 12:49AM	T120 SPEED 16-20 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F147865188	UNPAID 07/16/2022	07/16/2022 08:03PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F147200954	UNPAID 07/02/2022	07/02/2022 12:54PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F146903568	UNPAID 06/25/2022	06/25/2022 08:43PM	T119 SPEED 11-15 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145735253	UNPAID 05/29/2022	05/29/2022 05:50PM	T120 SPEED 16-20 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F145280123	UNPAID 05/19/2022	05/19/2022 09:31AM	T120 SPEED 16-20 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F145104521	UNPAID 05/14/2022	05/14/2022 07:25PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F144564600	UNPAID 05/01/2022	05/01/2022 08:17AM	T120 SPEED 16-20 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F141802627	UNPAID 02/17/2022	02/17/2022 06:47PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F140490532	UNPAID 01/09/2022	01/09/2022 11:33AM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F140431485	UNPAID 01/08/2022	01/08/2022 02:46PM	T120 SPEED 16-20 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F139920565	UNPAID 12/21/2021	12/21/2021 12:50PM	T119 SPEED 11-15 OVR LIMT	INFI	4600 BLK MASSACHUSETTS AVE NW NW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F139600469	UNPAID 12/10/2021	12/10/2021 05:50AM	T120 SPEED 16-20 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F139388616	UNPAID 12/01/2021	12/01/2021 11:05PM	T119 SPEED 11-15 OVR LIMT	INF	2200 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F139336275	UNPAID 11/29/2021	11/29/2021 12:43PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F137574925	UNPAID 09/27/2021	09/27/2021 05:10PM	T119 SPEED 11-15 OVR LIMT	INFI	100 BLK MICHIGAN AVE NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F136954878	UNPAID 09/10/2021	09/10/2021 09:31PM	T120 SPEED 16-20 OVR LIMT	INFI	3900 BLK E CAPITOL ST SE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F136306511	UNPAID 08/25/2021	08/25/2021 07:19PM	T120 SPEED 16-20 OVR LIMT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F135499151	UNPAID 08/06/2021	08/06/2021 09:49PM	T119 SPEED 11-15 OVR LIMT	INFI	2200 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F134773180	UNPAID 07/21/2021	07/21/2021 07:39PM	T121 SPEED 21-25 OVR LIMT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F134773067	UNPAID 07/21/2021	07/21/2021 07:36PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F134209296	UNPAID 07/10/2021	07/10/2021 01:40PM	T119 SPEED 11-15 OVR LIMIT	INFI	4600 BLK MASSACHUSETTS AVE NW NW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F133823091	UNPAID 07/03/2021	07/03/2021 07:21AM	T120 SPEED 16-20 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F133373523	UNPAID 06/24/2021	06/24/2021 04:07PM	T121 SPEED 21-25 OVR LIMIT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F133185228	UNPAID 06/20/2021	06/20/2021 01:27PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F131623253	UNPAID 05/22/2021	05/22/2021 12:03AM	T120 SPEED 16-20 OVR LIMIT	INFI	3900 BLK E CAPITOL ST SE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F131615535	UNPAID 05/21/2021	05/21/2021 08:00PM	T119 SPEED 11-15 OVR LIMIT	INFI	1700 BLK C ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F131418389	UNPAID 05/17/2021	05/17/2021 02:45PM	T119 SPEED 11-15 OVR LIMIT	INFI	3900 BLK E CAPITOL ST SE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F131418290	UNPAID 05/17/2021	05/17/2021 02:43PM	T121 SPEED 21-25 OVR LIMIT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F130856811	UNPAID 05/04/2021	05/04/2021 03:22PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F130667415	UNPAID 05/01/2021	05/01/2021 11:38AM	T120 SPEED 16-20 OVR LIMIT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F130355486	UNPAID 04/24/2021	04/24/2021 12:06PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F130238615	UNPAID 04/21/2021	04/21/2021 06:53PM	T120 SPEED 16-20 OVR LIMIT	INFI	2500 BLK INDEPENDENCE AVE SE NE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F129779518	UNPAID 04/11/2021	04/11/2021 12:15PM	T119 SPEED 11-15 OVR LIMIT	INFI	1300 BLK NEW JERSEY AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129818217	UNPAID 04/12/2021	04/12/2021 04:46AM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129488472	UNPAID 04/04/2021	04/04/2021 07:08PM	T120 SPEED 16-20 OVR LIMIT	INFI	3900 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F129488723	UNPAID 04/04/2021	04/04/2021 07:13PM	T120 SPEED 16-20 OVR LIMIT	INFI	2200 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F129237147	UNPAID 03/30/2021	03/30/2021 05:23PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F128349539	UNPAID 03/08/2021	03/08/2021 07:57PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F128069351	UNPAID 03/02/2021	03/02/2021 12:31PM	T120 SPEED 16-20 OVR LIMIT	INFI	3900 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F128069677	UNPAID 03/02/2021	03/02/2021 12:36PM	T119 SPEED 11-15 OVR LIMIT	INFI	2200 BLK SOUTH DAKOTA AVE NE SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F127927324	UNPAID 02/25/2021	02/25/2021 08:02PM	T119 SPEED 11-15 OVR LIMIT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F127756167	UNPAID 02/21/2021	02/21/2021 12:02AM	T120 SPEED 16-20 OVR LIMIT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F127717375	UNPAID 02/20/2021	02/20/2021 01:48AM	T119 SPEED 11-15 OVR LIMIT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F126125163	UNPAID 01/02/2021	01/02/2021 01:21PM	T121 SPEED 21-25 OVR LIMIT	INFI	600 BLK KENILWORTH AVE NE S/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F125574853	UNPAID 12/17/2020	12/17/2020 03:06PM	T119 SPEED 11-15 OVR LIMIT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F125165902	UNPAID 12/05/2020	12/05/2020 11:38AM	T119 SPEED 11-15 OVR LIMIT	INFI	1400 BLK BLADENSBURG RD NE S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F123783839	UNPAID 10/29/2020	10/29/2020 11:52AM	T119 SPEED 11-15 OVR LIMIT	INFI	4600 BLK MASSACHUSETTS AVE NW NW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F122719039	UNPAID 10/02/2020	10/02/2020 03:21PM	T120 SPEED 16-20 OVR LIMIT	INFI	3700 BLK MASSACHUSETTS AVE SE NW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F122467768	UNPAID 09/26/2020	09/26/2020 02:34PM	T119 SPEED 11-15 OVR LIMIT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F119540658	UNPAID 07/28/2020	07/28/2020 06:38PM	T119 SPEED 11-15 OVR LIMIT	INFI	1700 BLK C ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F117698586	UNPAID 06/23/2020	06/23/2020 11:53AM	T119 SPEED 11-15 OVR LIMIT	INFI	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00








Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F116561616	UNPAID 05/24/2020	05/24/2020 11:28AM	T119 SPEED 11-15 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F116440513	UNPAID 05/21/2020	05/21/2020 05:10PM	T119 SPEED 11-15 OVR LIMT	INFI	4000 BLK EAST CAPITOL ST NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F115676572	UNPAID 05/02/2020	05/02/2020 06:47PM	T119 SPEED 11-15 OVR LIMT	INFI	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F115398475	UNPAID 04/25/2020	04/25/2020 02:09PM	T120 SPEED 16-20 OVR LIMT	INFI	DC 295 .4 MI S/O PENN AVE SE SW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F112921078	UNPAID 03/06/2020	03/06/2020 11:27PM	T119 SPEED 11-15 OVR LIMT	INFI	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F112793051	UNPAID 03/03/2020	03/03/2020 12:47AM	T119 SPEED 11-15 OVR LIMT	INFI	600 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F112558860	UNPAID 02/25/2020	02/25/2020 01:07PM	T119 SPEED 11-15 OVR LIMT	INFI	1100 blk Bladensburg Rd NE ne/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F111841134	UNPAID 02/01/2020	02/01/2020 01:29PM	T120 SPEED 16-20 OVR LIMT	INFI	2200 blk K St NW w/b 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F111407545	UNPAID 01/18/2020	01/18/2020 01:00AM	T121 SPEED 21-25 OVR LIMT	INFI	3300 blk New York Ave NE e/b 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F110961228	UNPAID 01/01/2020	01/01/2020 10:56AM	T119 SPEED 11-15 OVR LIMT	INFI	1700 blk C St NE w/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F110425877	UNPAID 12/15/2019	12/15/2019 02:06PM	T119 SPEED 11-15 OVR LIMT	INFI	DC295 SW .2 miles s/o exit 1 n/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F110148937	UNPAID 12/05/2019	12/05/2019 11:43AM	T119 SPEED 11-15 OVR LIMT	INFI	1700 blk C St NE w/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F104820405	UNPAID 08/10/2019	08/10/2019 09:15AM	T119 SPEED 11-15 OVR LIMT	INFI	DC 295 .4mi s/o PA Ave SE sw/b (WZ) 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F102039144	UNPAID 06/17/2019	06/17/2019 03:12AM	T120 SPEED 16-20 OVR LIMT	INFI	3rd St Tunnel NW s/b by 3rd St (WZ) 013:DEEMED LIABLE	\$300.00	\$420.00	\$720.00
F101942335	UNPAID 06/16/2019	06/16/2019 02:16AM	T119 SPEED 11-15 OVR LIMT	INFI	600 blk New York Ave NE e/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F099982302	UNPAID 04/29/2019	04/29/2019 10:27PM	T120 SPEED 16-20 OVR LIMT	INFI	3rd St Tunnel NW s/b by 3rd St 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F097170734	UNPAID 02/12/2019	02/12/2019 12:11PM	T119 SPEED 11-15 OVR LIMT	INFI	6700 blk 16th St NW n/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F096596326	UNPAID 01/25/2019	01/25/2019 02:58AM	T119 SPEED 11-15 OVR LIMT	INFI	3rd St Tunnel NW n/b by MA Ave 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F095642554	UNPAID 12/28/2018	12/28/2018 03:32PM	T119 SPEED 11-15 OVR LIMT	INFI	1700 blk C St NE w/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00

32. DMV records currently reflect that Defendant Kirkland has 82 delinquent traffic tickets issued to this license plate, totaling \$25,320.

33. All 82 tickets on this license plate were for speeding. Of the 82 speeding tickets, Defendant Kirkland received 53 tickets for driving 11-15 miles per hour over the speed limit and 22 tickets for driving 16-20 miles per hour over the speed limit. Seven of Defendant Kirkland's 82 speeding tickets are for speeds that would constitute reckless driving, or driving 20 miles per hour or more over the speed limit. D.C. Code § 50-2201.04(b)(1).

34. Defendant Kirkland failed to answer and thus was deemed liable for all associated fines, penalties, and fees for these traffic infractions.

35. The District issued the following traffic tickets to Defendant Kirkland under Maryland license plate number **8BL6354**:





Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F086217917	 UNPAID 05/15/2018	05/15/2018 02:59PM	T119 SPEED 11-15 OVR LIMIT	NISS	16th St s/b @ Colorado Ave NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F083879893	 UNPAID 03/13/2018	03/13/2018 03:03PM	T120 SPEED 16-20 OVR LIMIT	NISS	16th St s/b @ Colorado Ave NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F082491713	 UNPAID 01/27/2018	01/27/2018 12:04PM	T120 SPEED 16-20 OVR LIMIT	NISS	600 blk Kenilworth Ave NE s/b 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F076206778	 UNPAID 07/30/2017	07/30/2017 06:12PM	T121 SPEED 21-25 OVR LIMIT	NISS	2800 blk New York Ave NE e/b 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F076038291	 UNPAID 07/27/2017	07/27/2017 02:35PM	T119 SPEED 11-15 OVR LIMIT	NISS	3200 blk Fort Lincoln Drive NE s/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F072102094	 UNPAID 04/16/2017	04/16/2017 06:38PM	T120 SPEED 16-20 OVR LIMIT	NISS	600 blk New York Ave NE e/b 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D020122270	 UNPAID 01/02/2017	01/02/2017 12:27PM	T113 SIGNAL PASS REDLIGHT	NISS	New York Ave w/b @ Florida Ave NE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00

36. DMV records currently reflect that Defendant Kirkland has seven delinquent traffic tickets issued to this license plate, totaling \$2,400.

37. Six of the seven tickets on this license plate are for speeding. Two tickets are for driving 11-15 miles per hour above the speed limit, three are for driving 16-20 miles per hour above the speed limit, and one is for driving 21-25 miles per hour above the speed limit, a speed that would constitute reckless driving, D.C. Code § 50-2201.04(b)(1). One ticket is for running a red light.

38. Defendant Kirkland failed to answer and thus was deemed liable for all associated fines, penalties, and fees for these traffic infractions.


39. The District issued the following traffic tickets to Defendant Kirkland under Maryland license plate **2AY5347**:

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
7012102650	 UNPAID 05/11/2013	05/11/2013 07:15PM	P280 EXPIRED METER RCPT	MAZD	1200 H ST NE BLOCK NORTH SIDE 013:DEEMED LIABLE	\$25.00	\$41.00	\$66.00
8114155836	 UNPAID 05/02/2013	05/02/2013 08:39PM	P012 DISOBYNG OFFICL SIGN	MAZDA	935 FRONT T ST NW NORTH SIDE 013:DEEMED LIABLE	\$30.00	\$48.00	\$78.00
7011326604	 UNPAID 03/24/2013	03/24/2013 02:00PM	P012 DISOBYNG OFFICL SIGN	TOYT	600 10TH ST NW BLOCK EAST SIDE 013:DEEMED LIABLE	\$30.00	\$48.00	\$78.00
8111118212	 UNPAID 02/28/2013	02/28/2013 08:48PM	P039 EXPIRED METER	MAZDA	600 BLOCK D ST NW SOUTH SIDE 013:DEEMED LIABLE	\$25.00	\$41.00	\$66.00

40. DMV records currently reflect that Defendant Kirkland has four delinquent traffic tickets issued to this license plate, totaling \$288.

41. Defendant Kirkland failed to answer and thus was deemed liable for all associated fines, penalties, and fees for these traffic infractions.

42. The District issued the following traffic ticket to Defendant Kirkland under Maryland license plate **435700T**:


Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F049709997	 UNPAID 06/18/2015	06/18/2015 07:51PM	T119 SPEED 11-15 OVR LIMIT	NISS	2400 blk 18th St NE s/b 013-DEEMED LIABLE	\$100.00	\$140.00	\$240.00

43. DMV records currently reflect that Defendant Kirkland has one delinquent traffic ticket issued to this license plate, totaling \$240.

44. This ticket is for driving 11-15 miles per hour above the speed limit.

45. Defendant Kirkland failed to answer and thus was deemed liable for the fine, penalty, and fee associated with this traffic infraction.

46. The District issued the following traffic ticket to Defendant Kirkland under Maryland license plate **1FJ5877**:

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F162691250	 UNPAID 07/30/2023	07/30/2023 07:15PM	T121 SPEED 21-25 OVR LIMIT	AUDI	3900 BLK E CAPITOL ST SE E/B 108-RECONSIDER DENIED	\$200.00	\$40.00	\$240.00

47. DMV records currently reflect that Defendant Kirkland has one delinquent traffic ticket issued to this license plate, totaling \$240.

48. Defendant Kirkland failed to answer and thus was deemed liable for the fine, penalty, and fee associated with this traffic infraction.

49. In total, across his driver's license and five license plates, Defendant Kirkland accumulated 98 traffic citations, mostly for speeding.

50. The DMV contacted Defendant Kirkland by mail, notifying him of *each* traffic ticket, the associated penalties, and the period to resolve each ticket. Overall, the DMV allotted Defendant Kirkland 120 days from the date of *each* initial traffic ticket to contest or resolve any associated fines and penalties.

51. Due to Defendant Kirkland's failure to resolve the traffic tickets with the DMV, the DMV referred Defendant Kirkland's unpaid fines and penalties to CCU.

52. CCU, through Harris & Harris, attempted to collect the underlying delinquent debt on multiple occasions by telephone and postal mail but was unsuccessful.

53. On October 18, 2024, CCU sent Defendant Kirkland a final demand letter notifying him of the unpaid delinquent debt and providing information on how to resolve it. Defendant Kirkland failed to resolve the delinquent debt with CCU.

54. CCU referred the matter to the Office of the Attorney General for the District of Columbia to initiate a civil action to collect the debt.

COUNT I
VIOLATION OF THE STRENGTHENING TRAFFIC
ENFORCEMENT, EDUCATION, AND RESPONSIBILITY AMENDMENT ACT
D.C. CODE § 50-2201.04

55. The District incorporates by reference all allegations stated as previously set forth in paragraphs 1-54.

56. The District may bring a civil suit against any driver or any motor vehicle alleged to have been driving at a rate of speed over a designated speed limit. D.C. Code § 50-2201.04(g)(1).

57. The owner of a registered vehicle is liable for payment of all fines, penalties, and fees associated with his or her traffic tickets. D.C. Code §§ 50-2209.02(a); *see also* 2302.05(e) ("If a person fails to answer the notice within 60 calendar days after the date the

notice was issued, . . . the commission of the infraction shall be deemed admitted and all points, penalties, and fines shall be assessed.”).

58. The District issued 82 tickets for speeding to Defendant Kirkland under Maryland license plate **1DM8595**, accounting for the entirety of the debt on this license plate, \$25,320.

59. Of the 82 speeding tickets, Defendant Kirkland received 53 tickets for driving 11-15 miles per hour over the speed limit and 22 tickets for driving 16-20 miles per hour over the speed limit. Seven of Defendant Kirkland’s 82 speeding tickets are for speeds that would constitute reckless driving, or driving 20 miles per hour or more over the speed limit. D.C. Code § 50-2201.04(b)(1).

60. Defendant Kirkland failed to answer and thus was deemed liable for the fines, penalties, and fees associated with these speeding infractions.

61. The District issued six speeding tickets to Defendant Kirkland under Maryland license plate **8BL6354**, accounting for \$2,040 of the debt on this license plate, \$2,400.

62. Defendant Kirkland failed to answer and thus was deemed liable for the fines, penalties, and fees associated with these speeding infractions.

63. The District issued one speeding ticket to Defendant Kirkland under Maryland license plate **435700T**, accounting for the entirety of the debt on this license plate, \$240.

64. Defendant Kirkland failed to answer and thus was deemed liable for the fine, penalty, and fee associated with this speeding infraction.

65. The District issued one speeding ticket to Defendant Kirkland under Maryland license plate **1FJ5877**, accounting for the entirety of the debt on this license plate, \$240.

66. Defendant Kirkland failed to answer and thus was deemed liable for the fine, penalty, and fee associated with this speeding infraction.

67. In total, Defendant Kirkland has 90 speeding tickets and owes the District \$27,840 in outstanding debt for failure to answer or otherwise pay the fines, penalties, and fees associated with the speeding infractions on his Maryland license plates.

COUNT II
DEFENDANT'S DELINQUENT DEBT UNDER
THE DELINQUENT DEBT RECOVERY ACT
D.C. CODE § 1-350.06

68. The District incorporates by reference all allegations previously set forth in paragraphs 1-67.

69. CCU, in its discretion, may refer delinquent debt owed to the District to the Office of the Attorney General for civil enforcement. D.C. Code § 1-350.06(a)(6).

70. CCU has referred to the Office of the Attorney General Defendant Kirkland's delinquent debt arising from his nonpayment of 98 traffic infractions.

71. As of the filing date, Defendant Kirkland owes the District \$1,512 for all traffic tickets issued under Florida driver's license **K624010853790**.

72. As of the filing date, Defendant Kirkland owes the District \$25,320 for all traffic tickets issued under Maryland license plate **1DM8595**.

73. As of the filing date, Defendant Kirkland owes the District \$2,400 for all traffic tickets issued under Maryland license plate **8BL6354**.

74. As of the filing date, Defendant Kirkland owes the District \$288 for all traffic tickets issued under Maryland license plate **2AY5347**.

75. As of the filing date, Defendant Kirkland owes the District \$240 for all traffic tickets issued under Maryland license plate **435700T**.

76. As of the filing date, Defendant Kirkland owes the District \$240 for all traffic tickets issued under Maryland license plate **1FJ5877**.

77. As Defendant Kirkland has failed to answer or otherwise resolve the traffic tickets associated with his registered license plates with the DMV noted above, the traffic infractions are deemed admitted, and Defendant Kirkland owes the assessed fines, penalties, and fees to the District. The District now seeks \$30,000 from Defendant Kirkland for *all* delinquent debt owed to the District arising from Defendant's outstanding traffic tickets set forth in this Complaint.

PRAYER FOR RELIEF

Wherefore, the District respectfully requests that the Court enter judgment in its favor and against Defendant as follows:

- (1) Award the District \$30,000 for Defendant's unpaid fines, penalties, and fees;
- (2) Award the District reasonable attorney's fees; and
- (3) Award the District such further and additional relief as the Court may deem just and proper.

Dated: December 19, 2025

Respectfully submitted,

BRIAN L. SCHWALB
Attorney General for the District of Columbia

CHAD COPELAND
Deputy Attorney General
Civil Litigation Division

/s/ Kimberly M. Johnson
KIMBERLY M. JOHNSON [435163]
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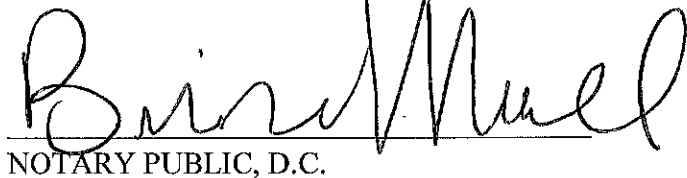
Attorneys for the District of Columbia

DISTRICT OF COLUMBIA, ss:

I, R. Daniel Brashier II, being duly sworn on oath, state that I am an Associate Treasurer for the District of Columbia Office of the Chief Financial Officer's Central Collection Unit, and as such I am the officer authorized to verify the foregoing Complaint in *District of Columbia v. Andrew Jerry Kirkland*. In that capacity, I affirm that the Complaint is a just and true statement of the amount due to the District from the defendant regardless of any set-off, counterclaim, or grounds for defense.



SIGNED AND SWORN to before me this 19th day of December 2025.


NOTARY PUBLIC, D.C.

My commission expires January 14 2030

