

**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.)

JAMES N. IBE)
4603 Doctor Beans Legacy Circle)
Suite 101)
Bowie, M.D. 20720)

and)

JD NURSING AND MANAGEMENT)
SERVICES INC.)
6120 Kansas Ave. N.W.)
Washington, D.C. 20011,)

Serve on: Victor Mbanefo, Registered Agent)
4402 7th Street N.W.)
Washington, D.C. 20017)

Defendants.)

Civil Action No.:

COMPLAINT FOR VIOLATION OF THE WAGE HOUR ACT

The District of Columbia, through the Office of the Attorney General, brings this lawsuit against James N. Ibe, individually, and J.D. Nursing and Management Services Inc. (together, “Defendants”) to recover unpaid wages pursuant to title 32, chapter 13 of the D.C. Code (the “Wage Hour Act”). In support of this Complaint, the District alleges as follows:

1. This is a lawsuit to recover unpaid wages owed by an employer to its employees. Defendants operated a home health care business in the District of Columbia, and employed individuals as personal care aides (“PCAs”) to deliver those services. The District of Columbia

brings this lawsuit on behalf of twenty-seven employees (the “Claimants”), who were employed by Defendants as PCAs, and to whom Defendants failed to pay wages owed to them.

JURISDICTION

2. This Court has subject matter jurisdiction over this civil action pursuant to D.C. Code § 11-921(a) and § 32-1306(a)(2)(A).

3. 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

4. Plaintiff the District of Columbia (“District”) is a municipal corporation created by an act of Congress, and is the local government for the territory constituting the permanent seat of the government of the United States. The District is empowered, through its Office of the Attorney General and pursuant to D.C. Code §§ 32-1306(a)(2)(A) and 32-1308(a)(1)(C)(vii), to bring this action on behalf of the public and at least twenty-seven former employees of Defendants: Michael Abraham, Alice Akinbolusire, Josephine A-Nyoumea, Maria Baez-Valerio, Sinaly Bamba, Marta Bonilla, LaDon Boyd, Danita Clarke, Stephen Eferunu, Jenie Gonzalez, Christina Harrison, Evonna Johnson, Sartana Kamguna, Blanca Lazo, Gladys Lopez, Oliva Lyimo, Yannick Mbazang, Dany Mbianga, Dora Menendez, Becky Okorie, Francisca Onyebgula, Sarah Ortiz, Anuhara Ramirez, George Techwei, Emmanuel Tegum, Stella Tengwei, and Susan Tingwei.

5. J.D. Nursing and Management Services Inc. (“JDNMS”), for all relevant times, engaged in the business of providing home health care services with its principal place of business in the District of Columbia at 6120 Kansas Avenue N.W., Washington, D.C. 20011.

6. Defendant James N. Ibe (“Ibe”), for all relevant times, was the Chief Executive Officer of JDNMS, where he transacted business in the District of Columbia by managing

JDNMS's operations from the JDNMS office at 6120 Kansas Avenue N.W., Washington D.C., 20011. During all relevant times, Ibe had the authority to control the conduct of Defendant JDNMS that violated the District's Wage Hour Act.

FACTS

Defendants' Business

7. For all relevant times, Defendants were engaged in the business of providing home health care services to clients residing in the District of Columbia. Home health care services include, but are not limited to, hygiene services and assisted living services, such as grocery shopping and meal preparation.

8. Defendants employed employees for the position of a PCA. PCAs were responsible for visiting clients at their places of residence and administering home health care services.

9. On September 2, 2015, the District of Columbia Department of Health Care Finance ("DHCF") filed a Notice of Suspension of Medicaid Payments (the "Notice"). The Notice suspended Medicaid payments from the District to JDNMS, and was based on allegations of fraud including, but not limited to, providing kickback payments to beneficiaries and billing for aide services when the aide was confirmed to be out of the country.

10. On September 8, 2015, JDNMS appealed the Notice to the Office of Administrative Hearings ("OAH").

11. On November 2, 5, and 9, 2015, OAH held an evidentiary hearing on JDNMS's appeal.

12. On May 6, 2016, an Administrative Law Judge affirmed DHCF's suspension of Medicaid payments to JDNMS in an order, finding that DHCF had proved by a preponderance of

the evidence that JDNMS engaged in intentional deception or misrepresentation with the knowledge that the deception would result in being paid for services not performed.

13. JDNMS appealed the OAH Order on June 2, 2016 to the District of Columbia Court of Appeals. The appeal is currently pending.

Wage Claims

14. All Claimants were employed by Defendants to work as PCAs, and paid an hourly wage of \$13.80 per hour.

15. Each Claimant's primary responsibility while employed for Defendants was the provision of home health care services to clients. Defendants assigned Claimants to clients, and directed their work schedules.

16. In order to receive paychecks, all Claimants were required to pick them up in person at JDNMS's office at 6120 Kansas Avenue N.W., Washington D.C. 20011.

17. All of the Claimants' wage claims concern Defendants' failure to pay wages for hours worked during pay period(s) in September 2015 through January 2016, as set forth as follows:

Michael Abraham

18. Defendants employed Mr. Abraham as a PCA beginning in approximately 2014, with a wage of \$13.80 per hour worked. Mr. Abraham worked as a PCA for Defendants until approximately January 2016.

19. Mr. Abraham never resigned from JDNMS, nor was he ever terminated by JDNMS.

20. Defendants failed to pay wages to Mr. Abraham for 40 hours worked for pay periods ending October 31, 2015; November 7, 2015; November 14, 2015; November 21, 2015; November 28, 2015; December 5, 2015; December 12, 2015; December 19, 2015;

December 26, 2015; January 2, 2016; and January 9, 2016—a total of 440 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Abraham at least \$6,072.00 in owed wages.

21. On March 3, 2016, Mr. Abraham filed a claim against Defendant JDNMS with the District of Columbia Department of Employment Services (“DOES”) that made the allegations in the preceding paragraph.

22. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Abraham for \$6,072.00 in unpaid wages and \$18,216.00 in treble damages.

23. To date, Defendants have failed to pay Mr. Abraham at least \$6,072.00 in owed wages, and they have failed to pay Mr. Abraham \$18,216.00 in treble damages.

24. Defendants’ failure to pay Mr. Abraham his owed wages is a violation of D.C. Code § 32-1302.

Alice Akinbolusire

25. Defendants employed Ms. Akinbolusire as a PCA beginning in approximately 2012, with a wage of \$13.80 per hour worked. Ms. Akinbolusire worked as a PCA for Defendants until approximately September 2015.

26. Ms. Akinbolusire never resigned from JDNMS, nor was she ever terminated by JDNMS.

27. Defendants failed to pay wages to Ms. Akinbolusire for 80 hours worked for a pay period ending September 25, 2015 and 24 hours worked for a pay period ending September 30, 2015—a total of 104 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Akinbolusire at least \$1,435.20 in owed wages.

28. On December 15, 2015, Ms. Akinbolusire filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

29. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Akinbolusire for \$1,435.20 in unpaid wages and \$4,305.60 in treble damages.

30. To date, Defendants have failed to pay Ms. Akinbolusire at least \$1,435.20 in owed wages, and they have failed to pay Ms. Akinbolusire \$4,305.60 in treble damages.

31. Defendants' failure to pay Ms. Akinbolusire her owed wages is a violation of D.C. Code § 32-1302.

Josephine A-Nyoumea

32. Defendants employed Ms. A-Nyoumea as a PCA, with a wage of \$13.80 per hour worked.

33. Defendants failed to pay wages to Ms. A-Nyoumea for 80 hours worked for a pay period ending September 26, 2015; 38 hours worked for a pay period ending October 3, 2015; and 8 hours worked for a pay period ending October 10, 2015—a total of 126 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. A-Nyoumea at least \$1,738.80 in owed wages.

34. On November 20, 2015, Ms. A-Nyoumea filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

35. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. A-Nyoumea for \$1,738.80 in unpaid wages and \$5,216.40 in treble damages.

36. To date, Defendants have failed to pay Ms. A-Nyoumea at least \$1,738.80 in owed wages, and they have failed to pay Ms. A-Nyoumea \$5,216.40 in treble damages.

37. Defendants' failure to pay Ms. A-Nyoumea her owed wages is a violation of D.C. Code § 32-1302.

Maria Baez-Valerio

38. Defendants employed Ms. Baez-Valerio as a PCA beginning in approximately 2014, with a wage of \$13.80 per hour worked. Ms. Baez-Valerio worked as a PCA for Defendants until approximately September 2015.

39. Ms. Baez-Valerio never resigned from JDNMS, nor was she ever terminated by JDNMS.

40. Defendants failed to pay wages to Ms. Baez-Valerio for 72 hours worked for a pay period ending September 6, 2015; 72 hours worked for a pay period ending September 13, 2015; 72 hours worked for a pay period ending September 20, 2015; and 40 hours worked for a pay period ending September 27, 2015—a total of 256 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Baez-Valerio at least \$3,532.80 in owed wages.

41. On November 27, 2015, Ms. Baez-Valerio filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

42. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Baez-Valerio for \$3,532.80 in unpaid wages and \$10,598.40 in treble damages.

43. To date, Defendants have failed to pay Ms. Baez-Valerio at least \$3,532.80 in owed wages, and they have failed to pay Ms. Baez-Valerio \$10,598.40 in treble damages.

44. Defendants' failure to pay Ms. Baez-Valerio her owed wages is a violation of D.C. Code § 32-1302.

Sinaly Bamba

45. Defendants employed Mr. Bamba as a PCA beginning in approximately 2009, with a wage of \$13.80 per hour worked. Mr. Bamba worked for JDNMS until approximately December 2015.

46. Mr. Bamba never resigned from JDNMS, nor was he ever terminated by JDNMS.

47. Defendants failed to pay wages to Mr. Bamba for 160 hours worked for a pay period ending September 9, 2015; 160 hours worked for a pay period ending October 1, 2015; 160 hours worked for a pay period ending November 1, 2015; and 40 hours worked for a pay period ending December 4, 2015—a total of 520 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Bamba at least \$7,176.00 in owed wages.

48. On December 4, 2015, Mr. Bamba filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

49. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Bamba for \$7,176.00 in unpaid wages and \$21,528.00 in treble damages.

50. To date, Defendants have failed to pay Mr. Bamba at least \$7,176.00 in owed wages, and they have failed to pay Mr. Bamba \$21,528.00 in treble damages.

51. Defendants' failure to pay Mr. Bamba his owed wages is a violation of D.C. Code § 32-1302.

Marta Bonilla

52. Defendants employed Ms. Bonilla as a PCA beginning in November 2010, with a wage of \$13.80 per hour worked. Ms. Bonilla worked as a PCA for Defendants until approximately September 2015.

53. Ms. Bonilla never resigned from JDNMS, nor was she ever terminated by JDNMS.

54. Defendants failed to pay wages to Ms. Bonilla for 48 hours worked for a pay period ending September 18, 2015; 48 hours worked for a pay period ending September 25, 2015; and 32 hours worked for a pay period ending September 30, 2015—a total of 128 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Bonilla at least \$1,766.40 in owed wages.

55. On December 10, 2015, Ms. Bonilla filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

56. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Bonilla for \$1,766.40 in unpaid wages and \$5,299.20 in treble damages.

57. To date, Defendants have failed to pay Ms. Bonilla at least \$1,766.40 in owed wages, and they have failed to pay Ms. Bonilla \$5,299.20 in treble damages.

58. Defendants' failure to pay Ms. Bonilla her owed wages is a violation of D.C. Code § 32-1302.

LaDon Boyd

59. Defendants employed Ms. Boyd as a PCA, with a wage of \$13.80 per hour worked.

60. Defendants failed to pay wages to Ms. Boyd for 80 hours worked for a pay period ending October 2, 2015. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Boyd at least \$1,104.00 in owed wages.

61. On October 21, 2015, Ms. Boyd filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

62. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Boyd for \$1,104.00 in unpaid wages and \$3,312.00 in treble damages.

63. To date, Defendants have failed to pay Ms. Boyd at least \$1,104.00 in owed wages, and they have failed to pay Ms. Boyd \$3,312.00 in treble damages.

64. Defendants' failure to pay Ms. Boyd her owed wages is a violation of D.C. Code § 32-1302.

Danita Clarke

65. Defendants employed Ms. Clarke as a PCA, with a wage of \$13.80 per hour worked.

66. Ms. Clarke never resigned from JDNMS, nor was she ever terminated by JDNMS.

67. Defendants failed to pay wages to Ms. Clarke for 50 hours worked for a pay period ending September 26, 2015; 32 hours worked for a pay period ending October 10, 2015; and 8 hours worked for a pay period ending October 24, 2015—a total of 90 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Clarke at least \$1,242.00 in owed wages.

68. On October 22, 2015, Ms. Clarke filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

69. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Clarke for \$1,242.00 in unpaid wages and \$3,726.00 in treble damages.

70. To date, Defendants have failed to pay Ms. Clarke at least \$1,242.00 in owed wages, and they have failed to pay Ms. Clarke \$3,726.00 in treble damages.

71. Defendants' failure to pay Ms. Clarke her owed wages is a violation of D.C. Code § 32-1302.

Stephen Eferunu

72. Defendants employed Mr. Eferunu as a PCA beginning in approximately 2013, with a wage of \$13.80 per hour worked. Mr. Eferunu worked as a PCA for Defendants until approximately September 2015.

73. Mr. Eferunu never resigned from JDNMS, nor was he ever terminated by JDNMS.

74. Defendants failed to pay wages to Mr. Eferunu for 40 hours worked for a pay period ending September 18, 2015; 40 hours worked for a pay period ending September 25, 2015; and 24 hours worked for a pay period ending September 30, 2015—a total of 104 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Eferunu at least \$1,435.20 in owed wages.

75. On October 26, 2015, Mr. Eferunu filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

76. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Eferunu for \$1,435.20 in unpaid wages and \$4,305.60 in treble damages.

77. To date, Defendants have failed to pay Mr. Eferunu at least \$1,435.20 in owed wages, and they have failed to pay Mr. Eferunu \$4,305.60 in treble damages.

78. Defendants' failure to pay Mr. Eferunu his owed wages is a violation of D.C. Code § 32-1302.

Jenie Gonzalez

79. Defendants employed Ms. Gonzalez as a PCA beginning in approximately July 2009, with a wage of \$13.80 per hour worked. Ms. Gonzalez worked as a PCA for Defendants until approximately October 2015.

80. Ms. Gonzalez never resigned from JDNMS, nor was she ever terminated by JDNMS.

81. Defendants failed to pay wages to Ms. Gonzalez for 16 hours worked for a pay period ending September 25, 2015; 120 hours worked for a pay period ending October 2, 2015; and 80 hours worked for a pay period ending October 20, 2015—a total of 216 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Gonzalez at least \$2,980.80 in owed wages.

82. On November 2, 2015, Ms. Gonzalez filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

83. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Gonzalez for \$2,980.80 in unpaid wages and \$8,942.40 in treble damages.

84. To date, Defendants have failed to pay Ms. Gonzalez at least \$2,980.80 in owed wages, and they have failed to pay Ms. Gonzalez \$8,942.40 in treble damages.

85. Defendants' failure to pay Ms. Gonzalez her owed wages is a violation of D.C. Code § 32-1302.

Christina Harrison

86. Defendants employed Ms. Harrison as a PCA beginning in approximately 2014, with a wage of \$13.80 per hour worked. Ms. Harrison worked as a PCA for Defendants until approximately September 2015.

87. Ms. Harrison never resigned from JDNMS, nor was she ever terminated by JDNMS.

88. Defendants failed to pay wages to Ms. Harrison for 56 hours worked for a pay period ending September 14, 2015 and 16 hours worked for a pay period ending September 28, 2015—a total of 72 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Harrison at least \$993.60 in owed wages.

89. On October 16, 2015, Ms. Harrison filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

90. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Harrison for \$993.60 in unpaid wages and \$2,980.80 in treble damages.

91. To date, Defendants have failed to pay Ms. Harrison at least \$993.60 in owed wages, and they have failed to pay Ms. Harrison \$2,980.80 in treble damages.

92. Defendants' failure to pay Ms. Harrison her owed wages is a violation of D.C. Code § 32-1302.

Evonna Johnson

93. Defendants employed Ms. Johnson as a PCA beginning in approximately 2011, with a wage of \$13.80 per hour worked. Ms. Johnson worked as a PCA for Defendants until approximately October 2015.

94. Ms. Johnson never resigned from JDNMS, nor was she ever terminated by JDNMS.

95. Defendants failed to pay wages to Ms. Johnson for 40 hours worked for a pay period ending September 13, 2015; 40 hours worked for a pay period ending September 20, 2015; 40 hours worked for a pay period ending September 27, 2015; 40 hours worked for a pay period ending October 4, 2015; 40 hours worked for a pay period ending October 11, 2015; and 17 hours worked for a pay period ending October 18, 2015—a total of 217 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Johnson at least \$2,994.60 in owed wages.

96. On November 11, 2015, Ms. Johnson filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

97. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Johnson for \$2,994.60 in unpaid wages and \$8,983.80 in treble damages.

98. To date, Defendants have failed to pay Ms. Johnson at least \$2,994.60 in owed wages, and they have failed to pay Ms. Johnson \$8,983.80 in treble damages.

99. Defendants' failure to pay Ms. Johnson her owed wages is a violation of D.C. Code § 32-1302.

Sartana Kamguna

100. Defendants employed Mr. Kamguna as a PCA beginning in approximately 2014, with a wage of \$13.80 per hour worked. Mr. Kamguna worked as a PCA for Defendants until approximately January 2016.

101. Mr. Kamguna never resigned from JDNMS, nor was he ever terminated by JDNMS.

102. Defendants failed to pay wages to Mr. Kamguna for 32 hours worked for a pay period ending June 21, 2015; 32 hours worked for a pay period ending October 25, 2015; 64 hours

worked for a pay period ending November 29, 2015; 64 hours worked for a pay period ending December 27, 2015; and 16 hours worked for a pay period ending January 3, 2016—a total of 208 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Kamguna at least \$2,870.40 in owed wages.

103. On May 9, 2016, Mr. Kamguna filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

104. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Kamguna for \$2,870.40 in unpaid wages and \$8,611.20 in treble damages.

105. To date, Defendants have failed to pay Mr. Kamguna at least \$2,870.40 in owed wages, and they have failed to pay Mr. Kamguna \$8,611.20 in treble damages.

106. Defendants' failure to pay Mr. Kamguna his owed wages is a violation of D.C. Code § 32-1302.

Blanca Lazo

107. Defendants employed Ms. Lazo as a PCA, with a wage of \$13.80 per hour worked.

108. Ms. Lazo never resigned from JDNMS, nor was she ever terminated by JDNMS.

109. Defendants failed to pay wages to Ms. Lazo for 40 hours worked for a pay period ending September 11, 2015; 40 hours worked for a pay period ending September 18, 2015; 40 hours worked for a pay period ending September 25, 2015; and 24 hours worked for a pay period ending October 2, 2015—a total of 144 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Lazo at least \$1,987.20 in owed wages.

110. On December 7, 2015, Ms. Lazo filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

111. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Lazo for \$1,987.20 in unpaid wages and \$5,961.60 in treble damages.

112. To date, Defendants have failed to pay Ms. Lazo at least \$1,987.20 in owed wages, and they have failed to pay Ms. Lazo \$5,961.60 in treble damages.

113. Defendants' failure to pay Ms. Lazo her owed wages is a violation of D.C. Code § 32-1302.

Gladys Lopez

114. Defendants employed Ms. Lopez as a PCA beginning in approximately July 2014, with a wage of \$13.80 per hour worked. Ms. Lopez worked as a PCA for Defendants until approximately September 2015.

115. Ms. Lopez never resigned from JDNMS, nor was she ever terminated by JDNMS.

116. Defendants failed to pay wages to Ms. Lopez for 40 hours worked for a pay period ending September 18, 2015; 40 hours worked for a pay period ending September 25, 2015; and 24 hours worked for a pay period ending September 30, 2015—a total of 104 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Lopez at least \$1,435.20 in owed wages.

117. On November 15, 2015, Ms. Lopez filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

118. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Lopez for \$1,435.20 in unpaid wages and \$4,305.60 in treble damages.

119. To date, Defendants have failed to pay Ms. Lopez at least \$1,435.20 in owed wages, and they have failed to pay Ms. Lopez \$4,305.60 in treble damages.

120. Defendants' failure to pay Ms. Lopez her owed wages is a violation of D.C. Code § 32-1302.

Oliva Lyimo

121. Defendants employed Ms. Lyimo as a PCA, with a wage of \$13.80 per hour worked.

122. Defendants failed to pay wages to Ms. Lyimo for 80 hours worked for a pay period ending September 26, 2015; 80 hours worked for a pay period ending October 10, 2015; 80 hours worked for a pay period ending October 17, 2015; 69 hours worked for a pay period ending October 31, 2015; and 8 hours worked for a pay period ending November 14, 2015—a total of 317 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Lyimo at least \$4,374.60 in owed wages.

123. On November 20, 2015, Ms. Lyimo filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

124. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Lyimo for \$4,374.60 in unpaid wages and \$13,123.80 in treble damages.

125. To date, Defendants have failed to pay Ms. Lyimo at least \$4,374.60 in owed wages, and they have failed to pay Ms. Lyimo \$13,123.80 in treble damages.

126. Defendants' failure to pay Ms. Lyimo her owed wages is a violation of D.C. Code § 32-1302.

Yannick Mbazang

127. Defendants employed Mr. Mbazang as a PCA, with a wage of \$13.80 per hour worked.

128. Defendants failed to pay wages to Mr. Mbazang for 160 hours worked for a pay period ending October 30, 2015. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Mbazang at least \$2,208.00 in owed wages.

129. On January 12, 2016, Mr. Mbazang filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

130. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Mbazang for \$2,208.00 in unpaid wages and \$6,624.00 in treble damages.

131. To date, Defendants have failed to pay Mr. Mbazang at least \$2,208.00 in owed wages, and they have failed to pay Mr. Mbazang \$6,624.00 in treble damages.

132. Defendants' failure to pay Mr. Mbazang his owed wages is a violation of D.C. Code § 32-1302.

Dany Mbianga

133. Defendants employed Mr. Mbianga as a PCA beginning in approximately 2013, with a wage of \$13.80 per hour worked. Mr. Mbianga worked as a PCA for Defendants until approximately November 2015.

134. Mr. Mbianga never resigned from JDNMS, nor was he ever terminated by JDNMS.

135. Defendants failed to pay wages to Mr. Mbianga for 40 hours worked for pay periods ending September 19, 2015; September 26, 2015; October 3, 2015; October 10, 2015; October 17, 2015; October 24, 2015; October 31, 2015; November 7, 2015; November 14, 2015;

November 21, 2015; November 28, 2015—a total of 440 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Mbianga at least \$6,072.00 in owed wages.

136. On December 11, 2015, Mr. Mbianga filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

137. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Mbianga for \$6,072.00 in unpaid wages and \$18,216.00 in treble damages.

138. To date, Defendants have failed to pay Mr. Mbianga at least \$6,072.00 in owed wages, and they have failed to pay Mr. Mbianga \$18,216.00 in treble damages.

139. Defendants' failure to pay Mr. Mbianga his owed wages is a violation of D.C. Code § 32-1302.

Dora Menendez

140. Defendants employed Ms. Menendez as a PCA beginning in approximately 2013, with a wage of \$13.80 per hour worked. Ms. Menendez worked as a PCA for Defendants until approximately September 2015.

141. Ms. Menendez never resigned from JDNMS, nor was she ever terminated by JDNMS.

142. Defendants failed to pay wages to Ms. Menendez for 48 hours worked for a pay period ending September 3, 2015. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Menendez at least \$662.40 in owed wages.

143. On January 14, 2016, Ms. Menendez filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

144. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Menendez for \$662.40 in unpaid wages and \$1,987.20 in treble damages.

145. To date, Defendants have failed to pay Ms. Menendez at least \$662.40 in owed wages, and they have failed to pay Ms. Menendez \$1,987.20 in treble damages.

146. Defendants' failure to pay Ms. Menendez her owed wages is a violation of D.C. Code § 32-1302.

Becky Okorie

147. Defendants employed Ms. Okorie as a PCA, with a wage of \$13.80 per hour worked.

148. Defendants failed to pay wages to Ms. Okorie for 16 hours worked for a pay period ending September 20, 2015; 8 hours worked for a pay period ending September 21, 2015; 16 hours worked for a pay period ending September 26, 2015; 16 hours worked for a pay period ending September 27, 2015; 8 hours worked for a pay period ending September 28, 2015; and 16 hours worked for a pay period ending October 3, 2015—a total of 80 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Okorie at least \$1,104.00 in owed wages.

149. On October 7, 2015, Ms. Okorie filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

150. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Okorie for \$1,104.00 in unpaid wages and \$3,312.00 in treble damages.

151. To date, Defendants have failed to pay Ms. Okorie at least \$1,104.00 in owed wages, and they have failed to pay Ms. Okorie \$3,312.00 in treble damages.

152. Defendants' failure to pay Ms. Okorie her owed wages is a violation of D.C. Code § 32-1302.

Francisca Onyegbula

153. Defendants employed Ms. Onyegbula as a PCA beginning in approximately 2015, with a wage of \$13.80 per hour worked. Ms. Onyegbula worked as a PCA for Defendants until approximately November 2015.

154. Ms. Onyegbula never resigned from JDNMS, nor was she ever terminated by JDNMS.

155. Defendants failed to pay wages to Ms. Onyegbula for 80 hours worked for pay periods ending September 25, 2015; October 30, 2015; and November 28, 2015—a total of 240 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Onyegbula at least \$3,312.00 in owed wages.

156. On January 19, 2016, Ms. Onyegbula filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

157. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Onyegbula for \$3,312.00 in unpaid wages and \$9,936.00 in treble damages.

158. To date, Defendants have failed to pay Ms. Onyegbula at least \$3,312.00 in owed wages, and they have failed to pay Ms. Onyegbula \$9,936.00 in treble damages.

159. Defendants' failure to pay Ms. Onyegbula her owed wages is a violation of D.C. Code § 32-1302.

Sarah Ortiz

160. Defendants employed Ms. Ortiz as a PCA, with a wage of \$13.80 per hour worked.

161. Defendants failed to pay wages to Ms. Ortiz for 62 hours worked for pay periods between September 9, 2015 and October 1, 2015. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Ortiz at least \$855.60 in owed wages.

162. On October 19, 2015, Ms. Ortiz filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

163. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Ortiz for \$855.60 in unpaid wages and \$2,566.80 in treble damages.

164. To date, Defendants have failed to pay Ms. Ortiz at least \$855.60 in owed wages, and they have failed to pay Ms. Ortiz \$2,566.80 in treble damages.

165. Defendants' failure to pay Ms. Ortiz her owed wages is a violation of D.C. Code § 32-1302.

Anuhara Ramirez

166. Defendants employed Ms. Ramirez as a PCA, with a wage of \$13.80 per hour worked. Ms. Ramirez worked as a PCA for Defendants until approximately September 2015.

167. Ms. Ramirez never resigned from JDNMS, nor was she ever terminated by JDNMS.

168. Defendants failed to pay wages to Ms. Ramirez for 48 hours worked for a pay period ending September 19, 2015; 48 hours worked for a pay period ending September 26, 2015; and 32 hours worked for a pay period ending September 30, 2015—a total of 128 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Ramirez at least \$1,766.40 in owed wages.

169. On October 21, 2015, Ms. Ramirez filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

170. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Ramirez for \$1,766.40 in unpaid wages and \$5,299.20 in treble damages.

171. To date, Defendants have failed to pay Ms. Ramirez at least \$1,766.40 in owed wages, and they have failed to pay Ms. Ramirez \$5,299.20 in treble damages.

172. Defendants' failure to pay Ms. Ramirez her owed wages is a violation of D.C. Code § 32-1302.

George Techwei

173. Defendants employed Mr. Techwei as a PCA, with a wage of \$13.80 per hour worked.

174. Defendants failed to pay wages to Mr. Techwei for 70 hours worked for a pay period ending October 6, 2015. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Techwei at least \$966.00 in owed wages.

175. On January 20, 2016, Mr. Techwei filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

176. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Techwei for \$966.00 in unpaid wages and \$2,898.00 in treble damages.

177. To date, Defendants have failed to pay Mr. Techwei at least \$966.00 in owed wages, and they have failed to pay Mr. Techwei \$2,898.00 in treble damages.

178. Defendants' failure to pay Mr. Techwei his owed wages is a violation of D.C. Code § 32-1302.

Emmanuel Tegum

179. Defendants employed Mr. Tegum as a PCA, with a wage of \$13.80 per hour worked.

180. Mr. Tegum never resigned from JDNMS, nor was he ever terminated by JDNMS.

181. Defendants failed to pay wages to Mr. Tegum for 16 hours worked for a pay period ending September 16, 2015; 16 hours worked for a pay period ending September 19, 2015; 16 hours worked for a pay period ending September 24, 2015; 36 hours worked for a pay period ending October 2, 2015; and 24 hours worked for a pay period ending October 11, 2015—a total of 108 hours worked. Based on his hourly wage of \$13.80 per hour, Defendants should have paid Mr. Tegum at least \$1,490.40 in owed wages.

182. On October 27, 2015, Mr. Tegum filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

183. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Mr. Tegum for \$1,490.40 in unpaid wages and \$4,471.20 in treble damages.

184. To date, Defendants have failed to pay Mr. Tegum at least \$1,490.40 in owed wages, and they have failed to pay Mr. Tegum \$4,471.20 in treble damages.

185. Defendants' failure to pay Mr. Tegum his owed wages is a violation of D.C. Code § 32-1302.

Stella Tingwei

186. Defendants employed Ms. Stella Tingwei as a PCA beginning in approximately 2011, with a wage of \$13.80 per hour worked. Ms. Stella Tingwei worked as a PCA for Defendants until approximately October 2015.

187. Ms. Tingwei never resigned from JDNMS, nor was she ever terminated by JDNMS.

188. Defendants failed to pay wages to Ms. Stella Tingwei for 64 hours worked for a pay period ending October 2, 2015; and 64 hours worked for a pay period ending October 16, 2015—a total of 128 hours worked. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Stella Tingwei at least \$1,766.40 in owed wages.

189. On January 20, 2016, Ms. Stella Tingwei filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

190. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Stella Tingwei for \$1,766.40 in unpaid wages and \$5,299.20 in treble damages.

191. To date, Defendants have failed to pay Ms. Stella Tingwei at least \$1,766.40 in owed wages, and they have failed to pay Ms. Stella Tingwei \$5,299.20 in treble damages.

192. Defendants' failure to pay Ms. Stella Tingwei her owed wages is a violation of D.C. Code § 32-1302.

Susan Tingwei

193. Defendants employed Ms. Susan Tingwei as a PCA, with a wage of \$13.80 per hour worked.

194. Defendants failed to pay wages to Ms. Susan Tingwei for 80 hours worked for a pay period ending September 31, 2015. Based on her hourly wage of \$13.80 per hour, Defendants should have paid Ms. Susan Tingwei at least \$1,104.00 in owed wages.

195. On January 19, 2016, Ms. Susan Tingwei filed a claim against Defendant JDNMS with DOES that made the allegations in the preceding paragraph.

196. On December 14, 2016, DOES issued a Notice of Initial Determination that found JDNMS was liable to Ms. Susan Tingwei for \$1,104.00 in unpaid wages and \$3,312.00 in treble damages.

197. To date, Defendants have failed to pay Ms. Susan Tingwei at least \$1,104.00 in owed wages, and they have failed to pay Ms. Susan Tingwei \$3,312.00 in treble damages.

198. Defendants' failure to pay Ms. Susan Tingwei her owed wages is a violation of D.C. Code § 32-1302.

CLAIM FOR RELIEF UNDER THE WAGE HOUR ACT

199. The District re-alleges and re-avers paragraphs 7 through 198 of this Complaint as if fully set forth herein.

200. At all relevant times, Defendants were "employers" who employed Claimants as "employees," as defined in D.C. Code § 32-1301.

201. At all relevant times, Defendant Ibe controlled, or had the ability to control, Defendant JDNMS's conduct alleged in the Complaint to violate the District's Wage Hour Act. As such, at all relevant times, Defendant Ibe was also an individual violating the Wage Hour Act or is otherwise liable for Defendant JDNMS's violation of the Wage Hour Act.

202. Defendants failed to pay Claimants their owed wages for their hours worked as set out in this Complaint.

203. Defendants' failure to pay Claimants their owed wages constitutes a violation of the Wage Hour Act, which requires that an employer "shall pay all wages earned to his or her employees on regular paydays designated in advance by the employer." D.C. Code § 32-1302.

204. Under the Wage Hour Act, the Attorney General is authorized to bring a civil action in the Superior Court "against an employer or other person violating [the Wage Hour Act]"

for restitution or for injunctive, compensatory, or other authorized relief.” D.C. Code § 32-1306(a)(2)(A).

205. Due to Defendants’ failure to pay Claimants their owed wages, the Claimants suffered damages totaling at least Sixty-Four Thousand Four Hundred Forty-Six Dollars (\$64,446.00).

206. If Defendants are liable to Claimants for failure to pay owed wages, the Wage Hour Act provides that Claimants are entitled to liquidated damages equal to treble the amount of unpaid wages, which would total at least One Hundred Ninety-Three Thousand Three Hundred Thirty-Eight Dollars (\$193,338.00). D.C. Code § 32-1308(a)(1)(A)(ii).

207. The District brings this action on behalf of the Claimants to recover damages and liquidated damages, as authorized by D.C. Code § 32-1306(a)(2)(A).

REQUESTED RELIEF

WHEREFORE, the District of Columbia respectfully requests:

208. A declaratory judgment that the practices complained of herein are unlawful under the Wage Hour Act, D.C. Code § 13-1302, and an injunction against Defendants for further violations of the Wage Hour Act;

209. An award of back wages against Defendants, jointly and severally, due to the Claimants for Defendants’ violation of D.C. Code § 32-1302, as authorized by D.C. Code § 32-1306(a)(2)(A)(iii)(I), in the amount of Sixty-Four Thousand Four Hundred Forty-Six Dollars (\$64,446.00), or a different amount to be proven at trial;

210. An award of liquidated damages against Defendants, jointly and severally, due to the Claimants for Defendants’ violation of D.C. Code § 13-1302, as authorized by D.C. Code § 32-

1306(a)(2)(A)(iii)(II), in the amount of One Hundred Ninety-Three Thousand Three Hundred Thirty-Eight Dollars (\$193,338.00), or a different amount to be proven at trial;

211. Statutory penalties against Defendants, jointly and severally, as authorized by D.C. Code § 32-1306(a)(2)(A)(ii), in an amount to be proven at trial;

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

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

JURY DEMAND

Pursuant to Rule 38(b) of the D.C. Superior Court Rules, the District demands trial by jury on all issues so triable as of right by jury.

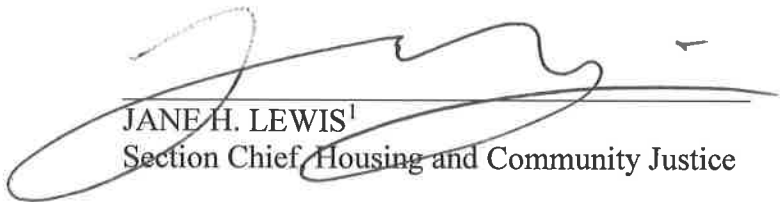
Dated: December 19, 2017

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ROBYN R. BENDER (D.C. Bar No. 465117)
Deputy Attorney General
Public Advocacy Division

JIMMY R. ROCK (D.C. Bar No. 493521)
Assistant Deputy Attorney General
Public Advocacy Division


JANE H. LEWIS¹
Section Chief, Housing and Community Justice

¹ Admitted to the Bar of the State of Maryland 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.



RANDOLPH T. CHEN (D.C. Bar No. 1032644)
Assistant Attorney General



ALACOQUE HINGA NEVITT²
Assistant Attorney General

441 4th Street, N.W.
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(202) 730-0623 (Fax)
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alacoque.nevitt@dc.gov

Attorneys for the District of Columbia

² 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

[Amended] INFORMATION SHEET

DISTRICT OF COLUMBIA _____

Case Number: _____

vs

Date: December 19, 2017

JAMES N. IBE and

J.D. NURSING & MANAGEMENT SERVICES INC.

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

Name: <i>(Please Print)</i> Randolph T. Chen	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff
Firm Name: D.C. Attorney General - Public Advocacy Division	<input type="checkbox"/> Self (Pro Se)
Telephone No.: _____ Six digit Unified Bar No.: _____ 202-442-9854 1036244	<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ At least \$257,784 Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

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

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

NATURE OF SUIT: <i>(Check One Box Only)</i>		
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 <input type="checkbox"/> 07 Insurance/Subrogation <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 <input type="checkbox"/> Over \$25,000 Consent Denied <input type="checkbox"/> 34 Insurance/Subrogation <input type="checkbox"/> Under \$25,000 Consent Denied
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 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 ^x IF USED

Information Sheet, Continued

C. OTHERS

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

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

12/19/2017

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

Plaintiff

vs.

Case Number _____

JAMES N. IBE

Defendant s

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 (D.C. Bar No. 1032644)
Name of Plaintiff's Attorney

Clerk of the Court

441 4th Street N.W.
Address
Washington, D.C. 20001

By _____
Deputy Clerk

202-442-9854
Telephone

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

_____ Demandante
 contra
 JAMES N. IBE _____ 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 (D.C. Bar No. 1032644)
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

441 4th Street N.W.
 Dirección
 Washington, D.C. 20001

Por: _____
 Subsecretario

202-442-9854
 Teléfono

Fecha _____

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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

Plaintiff

vs.

Case Number _____

J.D. NURSING & MANAGEMENT SERVICES INC.

Defendant s

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 (D.C. Bar No. 1032644)
Name of Plaintiff's Attorney

Clerk of the Court

441 4th Street N.W.
Address
Washington, D.C. 20001

By _____
Deputy Clerk

202-442-9854
Telephone

Date _____

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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

Demandante

contra

Número de Caso: _____

J.D. NURSING & MANAGEMENT SERVICES INC.

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 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 (D.C. Bar No. 1032644)
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

441 4th Street N.W.
 Dirección
Washington, D.C. 20001

Por: _____
 Subsecretario

202-442-9854
 Teléfono

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
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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
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