

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

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

Plaintiff,

v.

JULIA A. WHITE
590 15th Street S., Apartment 305
Arlington, Virginia 22202

and

KAMECHIA WHITE
4152 Silver Park Terrace
Suitland, Maryland 20746,

Defendants.

Civil Action No.: _____

JURY TRIAL DEMANDED

FALSE CLAIMS ACT COMPLAINT AND JURY DEMAND

The District of Columbia (District), by its Office of the Attorney General, brings this action against Julia A. White (Defendant J. White) and Kamechia White (Defendant K. White) pursuant to the District's False Claims Act, D.C. Code § 2-381.02(a), and common law, seeking treble damages and civil penalties. The District alleges as follows:

Jurisdiction

1. This Court has subject matter jurisdiction over this case under D.C. Code § 11-921, as this action is brought by the District, and D.C. Code § 2-381.02(a), as the

District asserts claims arising under the District's False Claims Act. This Court has personal jurisdiction over the Defendants pursuant to D.C. Code § 13-423(a)(1) and (3) because Defendants committed acts in the District that are proscribed by the District's False Claims Act.

Parties

2. The District of Columbia (District), a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. D.C. Code §§ 1-301.81(a)(1), 2-381.03. The Attorney General is specifically authorized to enforce the District's False Claims Act, pursuant to D.C. Code § 2-381.03(a).

3. Defendant Julia A. White (J. White), is an individual currently residing at 590 15th Street S., Apartment 305, Arlington, Virginia 22202. From 1998 to August 2012, Defendant J. White was employed as an Educational Aide by the District of Columbia Public Schools (DCPS). She is the mother of Defendant Kamechia White.

4. Defendant Kamechia White (K. White) is an individual currently residing at 4152 Silver Park Terrace, Suitland, Maryland 20746. She is the daughter of Defendant J. White.

Defendant K. White's Children

5. Defendant K. White is the mother of three children: M.F., K.J.W., and K.W.

6. Defendant K. White's son M.F. attended three DCPS schools during the time period relevant to this Complaint. For parts of the 2010-2011 and 2011-2012 school years and for the entirety of the 2012-2013 and 2013-2014 school years, M.F. attended Miner Elementary School, Langley Elementary School, and Peabody Elementary School. M.F. attended these DCPS schools tuition-free, as if he were a District resident.

7. From June 2009 through January 2013, M.F. received public benefits from the District.

8. From March 2011 through January 2013, K.J.W. and K.W. received public benefits from the District.

9. At all times relevant to the acts described in this Complaint, Defendant K. White was a resident of the State of Maryland. At all times relevant to the acts described in this Complaint, Defendant J. White was a resident of the State of Maryland or the Commonwealth of Virginia.

District of Columbia False Claims Act

10. The District's False Claim Act includes the following provisions:

(a) Any person who commits any of the following acts shall be liable to the District for 3 times the amount of damages which the District sustains because of the act of that person. A person who commits any of the following acts shall also be liable to the District for the costs of a civil action brought to recover penalties or damages, and may be liable to the

District for a civil penalty of not less than \$5,500, and not more than \$11,000, for each false or fraudulent claim for which the person:

* * *

(6) Knowingly makes, uses, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the District, or knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the District

D.C. Code § 2-381.02 (2013).

11. The District’s False Claims Act defines “[k]nowing” or “knowingly” to mean “[t]hat a person, with respect to information, does any of the following: (i) Has actual knowledge of the information; (ii) Acts in deliberate ignorance of the truth or falsity of the information; or (iii) Acts in reckless disregard of the truth or falsity of the information.” D.C. Code § 2-381.01(7)(A). Proof of specific intent to defraud is not required for an act to be knowing. D.C. Code § 2-381.01(7)(B).

12. The District’s False Claims Act defines “[m]aterial” to mean “having a natural tendency to influence, or be capable of influencing, the payment or receipt of money or property.” D.C. Code § 2-381.01(8).

13. The District’s False Claims Act defines “obligation” to mean “an established duty, whether or not fixed, arising from . . . statute or regulation, or from the retention of any overpayment.” D.C. Code § 2-381.01(9).

District of Columbia Nonresident Tuition Statute

14. D.C. Code § 38-302(a)(2) requires that nonresident tuition be paid for each child who attends a District public school and does not have a parent, guardian, custodian, or other primary caregiver who resides in the District. *See also* D.C. Code

§§ 38-1800.02(25), (25)(A); 5-A D.C.M.R. §§ 5001.5, 5099.1. Nonresident tuition rates are set by the District’s Office of the State Superintendent of Education to “cover all expenses” incurred by District public schools in educating the student. D.C. Code § 38-302(b).

15. D.C. Code § 38-301 (11) defines “parent” as “a natural parent, stepparent, or parent by adoption who has custody or control of a student, including joint custody.”

16. Nonresidents are required to pay tuition to enroll nonresident children in District public schools because public funds are appropriated to the schools for the sole purpose of educating the children and youth of District residents. D.C. Code § 38-2902.

District’s Medicaid Program

17. In 1965, Congress established Section XIX of the Social Security Act, 42 U.S.C. §§ 301 *et seq.*, creating a program commonly known as Medicaid. The Medicaid program is a joint federal-state program that provides medical benefits “on behalf of families with dependent children and of aged, blind, or disabled individuals, whose income and resources are sufficient to meet the costs of necessary medical services” 42 U.S.C. § 1396-1.

18. The District has enacted a Medicaid plan that provides Medicaid benefits to “eligible individuals who are residents of the [District].” District’s Medicaid Plan § 2.3. Under this plan, the District makes payments for the covered medical expenses of enrollees. 42 U.S.C. § 1396b.

19. As a condition of Medicaid eligibility, “[a]n individual shall be a resident of the District.” 29 D.C.M.R. § 9502.1. To qualify as a District resident under the District’s Medicaid Program, an individual must be “currently living” in the District, and either (i) intend “to remain there permanently or for an indefinite period,” or (ii) have entered the District “with a job commitment or seeking employment.” 42 C.F.R. § 435.403(i)(l).

District’s Supplemental Nutrition Assistance Program (SNAP)

20. In 1964, Congress established the Food Stamp Act of 1964, commonly known as the food stamp program. In 2008, Congress passed the Food, Conservation, and Energy Act of 2008, Pub. L. 110-246, 122 Stat. 1651, to rename the food stamp program as the Supplemental Nutrition Assistance Program (SNAP). SNAP provides nutritional food-purchasing assistance for low and no-income households. 7 C.F.R. § 271.1(a). Administration of the SNAP program is delegated to state and local governments. 7 C.F.R. § 271.4. The District established its SNAP program through the Food Stamp Expansion Act of 2009. D.C. Code §§ 4-261.01 *et seq.*

21. To be eligible to receive SNAP benefits, a household “shall live in the State in which it files an application for participation.” 7 C.F.R. § 273.3(a). Accordingly, recipients of SNAP benefits from the District must live in the District.

District’s Temporary Assistance for Needy Families (TANF) Program

22. In 1996, Congress passed the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, which provides block grants to states to establish and operate Temporary Assistance for Needy Families (TANF) programs. 42

U.S.C. §§ 601 *et seq.* The TANF program provides cash assistance to help heads-of-households provide for their minor children. D.C. Code § 4-202.01 established TANF as a category of public assistance in the District.

23. To be eligible for public assistance from the District, recipients must be residents of the District. “Recipients of assistance from the District who move to another jurisdiction with intent to remain in that State shall be ineligible to receive assistance from the District immediately upon the date of the recipient’s last day of residency in the District of Columbia.” D.C. Code § 4-205.04.

M.F.’s Attendance at DCPS Schools

24. In 2010, M.F. began attending Miner Elementary School (Miner ES), a DCPS school.

25. M.F. attended Miner ES, tuition-free, as if he were a District resident, for part of the 2010-2011 school year, from August 21, 2010 to January 10, 2011. During this time, M.F. was living with Defendant K. White in Maryland.

26. In 2011, M.F. began attending Langley Elementary School (Langley ES), a DCPS school.

27. M.F. attended Langley ES, tuition-free, as if he were a District resident, for part of the 2011-2012 school year, from September 15, 2011 to January 23, 2012. During this time, M.F. was living with Defendant K. White in Maryland.

28. In 2012, M.F. began attending Peabody Elementary School (Peabody ES), a DCPS school.

29. M.F. attended Peabody ES, tuition-free, as if he were a District resident, for the entirety of the 2012-2013 school year. During this time, M.F. was living with Defendant K. White in Maryland.

**Defendant K. White's Failure to Pay Nonresident Tuition
Owed to DCPS Schools**

30. Nonresident tuition for M.F. to attend Miner ES for part of the 2010-2011 school year was \$4,288.40.

31. Nonresident tuition for M.F. to attend Langley ES for part of the 2011-2012 school year was \$6,073.34.

32. Nonresident tuition for M.F. to attend Peabody ES for the entirety of the 2012-2013 school year was \$11,861.00.

33. The total amount of nonresident tuition for M.F.'s attendance at DCPS schools for these time periods was \$22,222.74.

34. To date, Defendant K. White has not paid any of the nonresident tuition owed for M.F.'s attendance at these DCPS schools for part of the 2010-2011 and 2011-2012 school years and for the entirety of the 2012-2013 school year, nor have any tuition payments been made on her behalf.

**Defendant J. White's False Statements to a DCPS School
(2013-2014 School Year)**

35. On September 12, 2013, Defendant J. White submitted an Enrollment Form to DCPS to enroll M.F. as a student at Miner ES for the 2013-2014 school year. On the Enrollment Form, Defendant J. White stated that she and M.F. lived at 1238 Van Buren Street, N.W., Washington, D.C. 20012. Under the "Parent/Guardian

Information and Other Primary Caregiver Information” section, Defendant J. White identified herself, but did not identify her “Relationship” to M.F. Under the “Residency Status” section of the Enrollment Form, Defendant J. White checked the box on the form next to “D.C. Resident (Student and parent or legal guardian live in D.C.),” indicating that she and M.F. were District residents. Under the “Housing Status” section, Defendant J. White checked the box next to “Permanent.” Under the “In Case of Emergency” section, Defendant J. White listed Defendant K. White, but did not list the “Relationship” to M.F. nor did she provide an address for Defendant K. White. Defendant J. White signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that “providing false information for purposes of defrauding the government is punishable by law.”

36. On August 28, 2013, Defendant J. White signed and submitted a sworn statement of D.C. residency to DCPS, affirming that she lived in the District at “1238 Van Buren Street, N.W.” Defendant J. White also indicated that she was M.F.’s “parent/guardian/caregiver.” Defendant J. White signed the form, stating that she understood that enrollment of M.F. was based on her representation of District residency, and that if the information in the verification form was false, she would be liable for payment of tuition for M.F.

37. Relying on the Enrollment Form and sworn statement of D.C. residency Defendant J. White submitted to Miner ES, DCPS enrolled M.F. at Miner ES for the 2013-2014 school year. M.F. was enrolled as a District resident.

38. Defendant J. White knew that the information she provided on the Enrollment Form and sworn statement of D.C. residency was false because when she signed and submitted the forms, she knew that she was not a “parent/guardian/caregiver” of M.F., and that she, Defendant K. White, and M.F. were living in Maryland, and not at the District address stated on the forms.

**Defendant K. White’s Knowing Avoidance of an Obligation to Pay District
Nonresident Tuition**

39. Defendant K. White, a resident of Maryland, knew she had an obligation to pay nonresident tuition for her son M.F. to attend Miner ES because she knew that she and her son M.F. did not reside in the District. As a resident of Maryland, Defendant K. White knew that she was obligated to pay nonresident tuition for her son to attend a DCPS school.

40. Defendant K. White knew that, by failing to notify the District that she and M.F. were Maryland residents, she improperly avoided, concealed, or decreased an obligation to pay nonresident tuition to the District for M.F.’s attendance at Miner ES.

**Defendants’ Failure to Pay Nonresident Tuition Owed to a DCPS School
(2013-2014 School Year)**

41. Nonresident tuition for M.F. to attend Miner ES for the 2013-2014 school year was \$9,306.00.

42. To date, Defendants have not paid any of the nonresident tuition owed for M.F. to attend Miner ES, nor have any tuition payments been made on their behalf.

**Defendant J. White's False Statements to the District's
Department of Human Services (DHS)**

43. On June 25, 2014, Defendant J. White applied to receive medical benefits from the District via telephone. Based on the information Defendant J. White provided to the D.C. Health Link Call Center Representative, an Insurance Affordability Application was submitted on her behalf.

44. In the Insurance Affordability Application, Defendant J. White stated that her residential address was 1238 Van Buren Street, N.W., Washington, D.C. 20012. Defendant J. White knew that the information she provided on the Insurance Affordability Application was false because when she provided this information, she was living in Maryland, and not at the District address she stated on the Application.

45. Relying on the information provided by Defendant J. White to the Call Center Representative who submitted the Insurance Affordability Application, the District's Department of Health Care Finance (DHCF) provided Defendant J. White with medical benefits through a Medicaid program, as if she were a District resident.

46. DHCF made monthly capitation payments to a managed care organization (MCO) to finance Defendant J. White's health care benefits. DHCF made additional payments to cover Defendant J. White's healthcare claims. From June 1, 2014 through May 31, 2018, DHCF made payments in the amount of \$21,742.37, for monthly capitation payments and healthcare claims for Defendant J. White.

47. To date, Defendant J. White has not reimbursed the District for any of the medical benefits she accepted while she was a resident of Maryland or Virginia, nor have any payments been made on her behalf.

**Defendant K. White's and Her Children's Receipt of
Medical Benefits from the District**

48. From October 2009 through January 2013, Defendant K. White received Medicaid benefits from DHCF on behalf of herself and her three children, K.J.W., K.W., and M.F., despite their residency in Maryland.

49. DHCF made monthly capitation payments to an MCO to finance Defendant K. White's health care benefits. DHCF made additional payments to cover Defendant K. White's healthcare claims. From October 2009 through January 2013, DHCF made payments in the amount of \$22,006.50, for monthly capitation payments and healthcare claims for Defendant K. White.

50. DHCF made monthly capitation payments to an MCO to finance K.J.W.'s health care benefits. DHCF made additional payments to cover K.J.W.'s healthcare claims. From March 2011 through January 2013, DHCF made payments in the amount of \$9,828.40, for monthly capitation payments and healthcare claims for K.J.W.

51. DHCF made monthly capitation payments to an MCO to finance K.W.'s health care benefits. DHCF made additional payments to cover K.W.'s healthcare claims. From March 2011 through December 2012, DHCF made payments in the amount of \$9,828.40, for monthly capitation payments and healthcare claims for K.W.

52. DHCF made monthly capitation payments to an MCO to finance M.F.'s health care benefits. DHCF made additional payments to cover M.F.'s healthcare claims. From February 2010 through January 2013, DHCF made payments in the amount of \$5,535.64, for monthly capitation payments and healthcare claims for M.F.

53. In sum, from October 2009 through January 2013, Defendant K. White received Medicaid benefits on behalf of herself and her three children from the District in the amount of \$47,198.94. During this time period, Defendant and her children were not eligible to receive these Medicaid benefits from the District because they resided in Maryland, and not in the District.

54. To date, Defendant K. White has not reimbursed the District for any of the medical benefits she accepted for herself, K.J.W., K.W., and M.F., nor have any payments been made on her behalf.

**Defendant K. White's False Statements to the
District's Department of Human Services (DHS)**

55. On September 18, 2017,¹ Defendant K. White signed and submitted an Application for Health Coverage & Help Paying Costs (Short Form) to the District's Department of Human Services (DHS) to apply for medical assistance and health coverage. On the form, Defendant K. White stated that she lived at "1301 Whitter [sic] Place, N.W., Washington, D.C. 20012." Defendant K. White signed the form, certifying that, she was "signing this application under penalty of perjury, which means I've provided true answers to all the questions on this form to the best of my knowledge. I know that I may be subject to penalties under federal law if I intentionally provide false or untrue information" and that she knew "that I must tell DC Health Link if anything changes (and is different than) what I wrote on this application."

¹ Although this Application is dated "09-18-19," the form was submitted in 2017. An additional supplemental questionnaire submitted contemporaneously was dated "9/18/17."

56. On September 18, 2017, Defendant signed and submitted a Supplemental Questions for Medical Assistance form (Supplemental Questionnaire) to complete her D.C. Health Link application. On the Application Signature Page, Defendant K. White marked the “Agree” box for the provisions that state: (1) “I understand that I must report changes that might affect my eligibility or the eligibility of a household member for Medicaid, private health insurance, or for help paying for private insurance”; (2) “I am the person whose name appears in the signature line below. I understand that I am submitting an application for Medicaid, private health insurance, or for help paying for private insurance and that information I have provided will be used to decide eligibility for each member of my application group”; and (3) “I have reviewed the information in this application and I attest under penalty of perjury that it is accurate and complete to the best of my knowledge. I understand if I am not truthful, there may be a penalty.”

57. Relying on the information provided by Defendant K. White on the Application for Health Coverage & Help Paying Costs (Short Form) and the Supplemental Questionnaire, DHCF provided Defendant K. White with medical assistance through a Medicaid program, as if she were a District resident.

58. From December 2017 to August 2018, during which time she lived in Maryland and not in the District, Defendant K. White received medical benefits from the District in the amount of \$2,863.62.

59. To date, Defendant K. White has not reimbursed the District for any of the medical benefits she accepted for herself, nor have any payments been made on her behalf.

**Defendant K. White and Her Children's Receipt of
SNAP Benefits from the District**

60. In December 2007, Defendant K. White began receiving SNAP benefits from the District for herself and on behalf of her son M.F. In May 2011, Defendant K. White began receiving SNAP benefits on behalf of herself, M.F., K.J.W., and K.W.

61. Defendant K. White continued receiving SNAP benefits from the District on behalf of herself and M.F. from June 2009 through January 2013, and on behalf of herself, K.J.W., and K.W. from May 2011 to January 2013, during which time she and her children lived in Maryland, and not in the District.

62. Between June 2009 and January 2013, Defendant K. White received SNAP benefits on behalf of herself and her children from the District in the amount of \$18,925.00.

63. To date, Defendant K. White has not reimbursed the District for any of the SNAP benefits she accepted while she was a resident of Maryland, nor have any payments been made on her behalf.

**Defendant K. White's and Her Children's Receipt of
TANF Benefits from the District**

64. In November 2007, Defendant K. White began receiving TANF benefits from the District on behalf of herself and her son M.F. In May 2011, Defendant K. White began receiving TANF benefits on behalf of herself, K.J.W., K.W., and M.F.

65. Defendant K. White continued receiving TANF benefits from the District on behalf of herself and M.F. from June 2009 through January 2013, and on behalf of herself, K.J.W., and K.W. from May 2011 to January 2013, during the entirety of which time period she and her children were not eligible to receive these benefits from the District because they lived in Maryland, and not in the District.

66. Between June 2009 and January 2013, Defendant K. White received SNAP benefits on behalf of herself and her children from the District in the amount of \$16,979.00.

67. To date, Defendant K. White has not reimbursed the District for any of the TANF benefits she accepted while she was a resident of Maryland, nor have any payments been made on her behalf.

COUNT I
False Claims Act
Knowingly Making a False Record or Statement Material to
an Obligation to Pay the District – Nonresident Tuition
(D.C. Code § 2-381.02(a)(6))

68. Paragraphs 1 through 67 are realleged as if fully set forth herein.

69. Defendant J. White knowingly made, used, and caused to be made or used, false records or statements material to an obligation to pay the District. Defendant J. White knowingly signed and submitted a false enrollment form and false sworn statement of D.C. residency, stating that she was M.F.'s parent or guardian and that she and M.F. resided in the District, causing a DCPS school to decline to charge nonresident tuition for M.F.'s attendance for the 2013-2014 school year in violation of D.C. Code § 2-381.02(a)(6).

COUNT II
False Claims Act
Knowingly Concealing and Knowingly and Improperly Avoiding or
Decreasing an Obligation to Pay the District – Nonresident Tuition
(D.C. Code § 2-381.02(a)(6))

70. Paragraphs 1 through 67 are realleged as if fully set forth herein.

71. Defendant K. White knowingly concealed and knowingly and improperly avoided or decreased an obligation to pay the District. Defendant K. White knew that she had an obligation to pay nonresident tuition for her son M.F. because she and M.F. did not reside in the District. Defendant K. White also knew that M.F. did not reside with Defendant J. White in the District. Defendant K. White failed to notify the District of her and M.F.'s correct address, causing a DCPS school to decline to charge nonresident tuition for M.F.'s attendance during the 2013-2014 school year in violation of D.C. Code § 2-381.02(a)(6).

COUNT III
False Claims Act
Knowingly Making a False Record or Statement Material to
an Obligation to Pay the District – Medicaid Benefits
(D.C. Code § 2-381.02(a)(6))

72. Paragraphs 1 through 67 are realleged as if fully set forth herein.

73. Defendant J. White knowingly made, used, and caused to be made or used, false records or statements material to an obligation to pay the District. Defendant J. White knew that she was ineligible to receive District Medicaid benefits. As a Maryland or Virginia resident, Defendant J. White knew that she had an obligation to pay for the Medicaid benefits provided by the District because she did not reside in the District. Defendant J. White knowingly provided incorrect residency

information to the District stating that she resided in the District, causing DHCF to pay for the medical benefits received by Defendant J. White from June 1, 2014 through May 31, 2018, in violation of D.C. Code § 2-381.02(a)(6).

74. Defendant K. White knowingly made, used, and caused to be made or used, false records or statements material to an obligation to pay the District. Defendant K. White knew that she was ineligible to receive District Medicaid benefits. As a Maryland resident, Defendant K. White knew that she had an obligation to pay for the Medicaid benefits provided by the District because she did not reside in the District. Defendant K. White knowingly signed and submitted an Application for Health Coverage & Help Paying Costs (Short Form) and provided incorrect residency information to the District stating that she resided in the District, causing DHCF to pay for the medical benefits received by Defendant K. White from December 2017 to August 2018, in violation of D.C. Code § 2-381.02(a)(6).

COUNT IV
Unjust Enrichment – Defendant J. White

75. Paragraphs 1 through 67 are realleged as if fully set forth herein.

76. To date, Defendant J. White continues to owe the District for Medicaid benefits she received from June 2014 to May 2018, to which she was not entitled as a Maryland or Virginia resident.

77. By accepting Medicaid benefits from DHCF for herself, despite living in Maryland or Virginia and not in the District, Defendant J. White has been unjustly enriched to the detriment of the District in the amount of \$21,742.37.

COUNT V
Unjust Enrichment – Defendant K. White

78. Paragraphs 1 through 67 are realleged as if fully set forth herein.

79. By having her son, M.F. attend DCPS schools for part of the 2010-2011 and 2011-2012 school years, and the entirety of the 2012-2013 and 2013-2014 school years, and by avoiding her obligation to pay nonresident tuition to the District despite her and M.F.'s residency in Maryland, Defendant K. White has been unjustly enriched to the detriment of the District in the amount of \$31,528.74.

80. To date, Defendant K. White continues to owe the District the entire amount of nonresident tuition owed for M.F.'s attendance at DCPS schools.

81. By accepting Medicaid benefits from DHCF for herself, K.J.W., K.W., and M.F. under the District's Medicaid program from October 1, 2009 to January 4, 2013, and for herself from December 2017 to August 2018, to which she was not entitled as a Maryland resident, Defendant K. White has been unjustly enriched to the detriment of the District in the amount of \$50,062.56.

82. To date, Defendant K. White continues to owe the District the entire amount of Medicaid benefits paid by the District for her and her children.

83. By accepting SNAP benefits from the District for her and her children during a time period that she and her children were residing in Maryland and not in the District, Defendant K. White has been unjustly enriched to the detriment of the District in the amount of \$18,925.00.

84. To date, Defendant K. White continues to owe the District the entire amount of SNAP benefits paid by the District for her and her children.

85. By accepting TANF benefits from the District for her and her children during a time period that she and her children were residing in Maryland and not in the District, Defendant K. White has been unjustly enriched to the detriment of the District in the amount of \$16,979.00.

86. To date, Defendant continues to owe the District the entire amount of TANF benefits paid by the District for her and her children.

Prayer for Relief

WHEREFORE, the District respectfully requests that this Court enter judgment in its favor and against Defendants on its claims and that this Court impose damages and penalties follows:

- (1) On Count I against Defendant J. White, award the District treble statutory damages in an amount to be determined at trial, but not less than \$27,918.00 (three times \$9,306.00); civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(6);
- (2) On Count II against Defendant K. White, award the District treble statutory damages in an amount to be determined at trial, but not less than \$27,918.00 (three times \$9,306.00); civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(6);
- (3) On Count III against Defendant J. White, award the District treble statutory damages in an amount to be determined at trial, but not less

- than \$65,227.11 (three times \$21,742.37); civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(6);
- (4) On Count III against Defendant K. White, award the District treble statutory damages in an amount to be determined at trial, but not less than \$8,590.86 (three times \$2,863.62); civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(6);
 - (5) On Count IV against Defendant J. White, award the District actual damages in an amount to be determined at trial, but not less than \$21,742.37;
 - (6) On Count V against Defendant K. White, award the District actual damages in an amount to be determined at trial, but not less than \$117,495.30;
 - (7) Award the District interest, costs, and other recoverable expenses permitted by law; and
 - (8) Award the District such further and additional relief as may be just and proper.

Jury Demand

The District of Columbia hereby demands a trial by jury by the maximum number of jurors permitted by law.

Date: August 23, 2019

Respectfully submitted

KARL A. RACINE
Attorney General for the District of Columbia

JIMMY R. ROCK
Acting Deputy Attorney General
Public Advocacy Division

/s/ Catherine A. Jackson
CATHERINE A. JACKSON
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