



Superior Court of the District of Columbia
Civil - Civil Actions Branch
500 Indiana Ave NW, Room 5000, Washington DC 20001
(202) 879-1133 | www.dccourts.gov

Case Number: 2023-CAB-006048

Case Caption: Allan Douglas Wilson v. Sergio Sarkany

INITIAL ORDER

Initial Hearing Date: Friday, 12/29/2023	Initial Hearing Time: 9:30 AM	Courtroom Location: Remote Courtroom 318
Please see attached instructions for remote participation.		
Your case is assigned to Associate Judge Milton C Lee.		

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-I, it is hereby ORDERED as follows:

- 1) This case is assigned to the judge and calendar designated above. All future filings in this case shall bear the calendar number and judge's name along with the case number in the caption.
- 2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of the summons, the complaint, and this Initial Order. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4.
- 3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).
- 4) At the time stated below, all counsel and unrepresented parties shall participate in a hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients before the hearing whether the clients are agreeable to binding or non-binding arbitration. This order is the only notice that parties and counsel will receive concerning this hearing.
- 5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference once, with the consent of all parties, to either of the two succeeding days when the calendar is called. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date. No other continuance will be granted except upon motion for good cause shown.
- 6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Anita M. Josey-Herring

To Join by Computer, Tablet, or Smartphone:

- 1) Copy and Paste or Type the link into a web browser and enter the Webex Meeting ID listed below.

Link: dccourts.webex.com/meet/ctb318

Meeting ID: 129 801 7169

- 2) When you are ready, click "Join Meeting".
- 3) You will be placed in the lobby until the courtroom clerk gives you access to the hearing.

Or to Join by Phone:

- 1) Call 202-860-2110 (local) or 844-992-4726 (toll-free)
- 2) Enter the Webex Meeting ID listed above followed by "##"

Resources and Contact Information:

- 1) For best practices on how to participate in Webex Meetings, click here <https://www.webex.com/learn/best-practices.html>.
- 2) For technical issues or questions, call the Information Technology Division at 202-879-1928 and select option 2.
- 3) For case questions, call the Civil Actions Branch Clerk's Office at (202) 879-1133.

ACCESSIBILITY AND LANGUAGE ACCESS

Persons with Disabilities:

If you have a disability as defined by the American Disabilities Act (ADA) and you require an accommodation, please call 202-879-1700 or email ADACoordinator@dcsc.gov. The D.C. Courts does not provide transportation service.

Interpreting and Translation Services:

The D.C. Courts offers free language access services to people having business with the court who are deaf or who are non-English speakers. Parties to a case may request free translations of court orders and other court documents. To ask for an interpreter or translation, please contact the Clerk's Office listed for your case. For more information, visit <https://www.dccourts.gov/language-access>.

Servicios de interpretación y traducción:

Los Tribunales del Distrito de Columbia ofrecen servicios gratuitos de acceso al idioma a las personas sordas o que no hablan inglés que tienen asuntos que atender en el tribunal. Las partes de un caso pueden solicitar traducciones gratuitas de las órdenes judiciales y otros documentos del tribunal. Para solicitar un intérprete o una traducción, póngase en contacto con la Secretaría de su caso.

Para más información, visite <https://www.dccourts.gov/language-access>.

El acceso al idioma es importante para los Tribunales del Distrito de Columbia. Puede dar su opinión sobre los servicios de idiomas visitando <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access>.

የቃልና የጽሑፍ ትርጓሜ አገልግሎቶች:

የዲ.ሲ. ፍርድ ቤቶች መስማት ለተሳናቸውና የእንግሊዝኛ ቋንቋ ተናጋሪ ላልሆኑ በፍርድ ቤቱ ጉዳይ ላላቸው ሰዎች ነጻ የቋንቋ ተደራሽነት አገልግሎቶች ያቀርባል። ተከራካሪ ወገኖች የፍርድ ቤት ትእዛዞችና ሌሎች የፍርድ ቤት ሰነዶች በነጻ እንዲተረጎሙላቸው መጠየቅ ይችላሉ። የቃል ወይም የጽሑፍ ትርጓሜ ለመጠየቅ እባክዎን በመዝገብዎ የተዘረዘረውን የጸሀፊ ቢሮ (ክለርክ'ስ ኦፊስ) ያናግሩ። ለተጨማሪ መረጃ <https://www.dccourts.gov/language-access> ይጎብኙ።

የቋንቋ ተደራሽነት ለዲ.ሲ. ፍርድ ቤቶች አስፈላጊ ነው። የቋንቋ አገልግሎቶች በተመለከተ አስተያየትዎን <https://www.dccourts.gov/services/information-and-resources/interpreting-services#language-access> በመጎብኘት መስጠት ይችላሉ።

Tips for Attending Remote Hearings - Civil Division

Your court hearing may be held remotely. This means that you will participate by phone or by video conference instead of coming to the courthouse. Here are some tips on how to prepare.

How do I know if I have a remote hearing?

The Court will contact you to tell you that your hearing is remote. They may contact you by sending you an email, letter in the mail, or by calling you.



How do I take part in a remote hearing?

The Court will give you step-by-step instructions on how to take part in the remote hearing.

If you lose your written notice, call the Civil Actions Clerk's Office for instructions at:

 202-879-1133

Is there anything that I should do before the day of the hearing?

- Let the court know immediately if you cannot join a hearing because you do not have a phone or computer.



Civil Actions Clerk's Office: 202-879-1133

- You may want to contact an attorney for legal help.
- You can also find the list of legal services providers at dccourts.gov/coronavirus by clicking on the link that says, "List of Legal Service Providers for Those Without an Attorney."
- Evidence: if you want the judge to review photos or documents, ask the judge how to submit your evidence.
- Witnesses: tell the judge if you want a witness to testify at your hearing.
- Accommodations & Language Access: let the court know if you need an interpreter or other accommodation for your hearing.

Tips for the Hearing



- Join the hearing a few minutes early!
- Charge your computer or phone and make sure you have enough minutes to join the call. Find a private and quiet space. If possible, be alone in a room during the hearing. Try to limit distractions as much as possible. If others are in the room with you, ask if they can be quiet during the hearing.
- Mute your microphone when you are not talking. Mute all sounds on your phone or computer.
- Say your name before you speak so the record is clear. Be prepared to identify your role in the hearing (e.g., observer, plaintiff, defendant, witness, etc.).
- Speak slowly and clearly so everyone hears what you are saying.
- Pause before speaking in case there is a lag. Use a headset or headphones if you can. This will free up your hands and sound better.
- Try not to talk over anyone else. Only one person can speak at a time. If you talk while someone else is talking, the judge will not be able to hear you.
- Have all your documents for the hearing in front of you. Have a pen and paper to take notes.
- If you are not ready for your hearing or want to speak with an attorney, you can ask the judge to postpone your hearing for another date.
- If your sound or video freezes during the hearing, use the chat feature or call the Clerk's Office to let them know that you are having technical issues.



Special Tips for Video Hearings

[\(Click here for more information\)](#)



- Download the court's hearing software, WebEx, in advance and do a test run! The Court will provide you with a WebEx link in advance of the hearing.
- Set up the camera at eye level. If you are using your phone, prop it up so you can look at it without holding it.
- Look at the camera when you speak and avoid moving around on the video.
- Wear what you would normally wear to court.
- Sit in a well-lit room with no bright lights behind you.
- If possible, find a blank wall to sit in front of. Remember the judge will be able to see everything on your screen, so pick a location that is not distracting.



District of Columbia Courts

Tips for Using DC Courts Remote



The DC Courts have **remote hearing sites** available in various locations in the community to help persons who may not have computer devices or internet service at home to participate in scheduled remote hearings. The Courts are committed to enhancing access to justice for all.

There are six remote access sites throughout the community which will operate: **Monday – Friday, 8:30 am – 4:00 pm.**

The remote site locations are:

Remote Site - 1

Balance and Restorative Justice Center
1215 South Capitol Street, SW
Washington, DC 20003

Remote Site - 2

Balance and Restorative Justice Center
1110 V Street, SE
Washington, DC 20020

Remote Site - 3

Balance and Restorative Justice Center
118 Q Street, NE
Washington, DC 20002



Remote Site - 4

Balance and Restorative Justice Center
920 Rhode Island Avenue, NE
Washington, DC 20018

Remote Site - 5

Reeves Center
2000 14th Street, NW, 2nd Floor
Community Room
Washington, DC 20009

Remote Site - 6

Reeves Center
2000 14th Street, NW, Suite 300N
Office of the Tenant Advocate
Washington, DC 20009
***** No walk-ins at this location *****

If you want to use a remote site location for your hearing, call **202-879-1900** or email DCCourtsRemoteSites@dcsc.gov **at least 24 hours before your hearing to reserve a remote access computer station.** If you require special accommodations such as an interpreter for your hearing, please call **202-879-1900 at least 24 hours in advance of your hearing so the Courts can make arrangements.**

You should bring the following items when you come to your scheduled site location

1. Your **case number** and any **hyperlinks** provided by the Courts for your scheduled hearing.
2. Any documents you need for the hearing (evidence), including exhibits, receipts, photos, contracts, etc.
3. Materials for notetaking, including pen and paper.

***Safety and security measures are in place at the remote sites.**

Contact information to schedule your remote access computer station:

Call: **202-879-1900**

Email: DCCourtsRemoteSites@dcsc.gov



Tribunales del Distrito de Columbia

Consejos para usar los sitios de audiencia remota de los Tribunales de DC



Los Tribunales de DC disponen de **sitios de audiencia remota** en distintos centros de la comunidad para ayudar a que las personas que no tienen dispositivos informáticos o servicio de Internet en su casa puedan participar en audiencias remotas programadas. Los Tribunales honran el compromiso de mejorar el acceso de toda la población a la justicia.

En toda la comunidad hay seis sitios de acceso remoto que funcionarán de **lunes a viernes, de 8:30 am a 4:00 pm**.

Los centros de acceso remoto son:

Sitio Remoto - 1

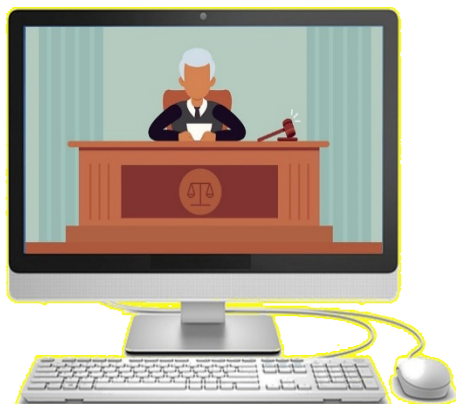
Balance and Restorative Justice Center
1215 South Capitol Street, SW
Washington, DC 20003

Sitio Remoto - 2

Balance and Restorative Justice Center
1110 V Street, SE
Washington, DC 20020

Sitio Remoto - 3

Balance and Restorative Justice Center
118 Q Street, NE
Washington, DC 20002



Sitio Remoto - 4

Balance and Restorative Justice Center
920 Rhode Island Avenue, NE
Washington, DC 20018

Sitio Remoto - 5

Reeves Center
2000 14th Street, NW, 2nd Floor
Community Room
Washington, DC 20009

Sitio Remoto - 6

Reeves Center
2000 14th Street, NW, Suite 300N
Office of the Tenant Advocate
Washington, DC 20009
No se puede entrar sin cita previa

Si desea usar un sitio remoto para su audiencia, llame al **202-879-1900** o envíe un mensaje de correo electrónico a DCCourtsRemoteSites@dcsc.gov **al menos 24 horas antes de la audiencia, para reservar una estación de computadora de acceso remoto**. Si necesita adaptaciones especiales, como un intérprete para la audiencia, llame al **202-879-1900 al menos 24 horas antes de la audiencia para que los Tribunales puedan hacer los arreglos necesarios**.

Cuando concurra al sitio programado debe llevar los siguientes artículos

1. Su **número de caso** y todos los **hipervínculos** que le hayan proporcionado los Tribunales para la audiencia programada.
2. Cualquier documento que necesite para la audiencia (prueba), incluidos documentos probatorios, recibos, fotos, contratos, etc.
3. Materiales para tomar nota, como papel y lápiz.

***Los sitios de acceso remoto cuentan con medidas de seguridad y protección.**

Información de contacto para programar su estación de computadora de acceso remoto:

Teléfono: **202-879-1900**

Correo electrónico: DCCourtsRemoteSites@dcsc.gov

Over the last 22 years It is believed that I have been subject to these abuses from both local sources on the ground and the threat in the sky. Anecdotally it is also believed that the reason for this targeting was suspicion of a crime directed by elements in police and defence departments. From a few instances and continuous surveillance following an initial incident in the year 2000, the frequency assault increased in 2009 which I perceived was a reaction in part to alleged Department abuses observed in my civilian post in an agency support position at the time. These abuses amounted to a legal case against the Crown involving Intelligence elements and I began to hear low-decibel death threats during my activities surrounding my brief exposure to this file. Further details of this may be communicated if there is some guarantee of amnesty from consequences under the Official Secrets Act.

Canada is presumably privy to the remote technologies identified as an ally of the US, which has the greatest potential footprint control. For Canada and its allies to be involved in any such program used to target civilians is considered contradictory to the purpose of defence. This is the nature of my claim against the Department.

The following is my request for compensation with references:

Defence spending per capital Canada 2021: \$612 USD [statista.com (Defense expenditures of NATO countries per capita 2021)]

22 years x \$612 USD = \$13,464 USD

2001 Canadian Forces deployed - 2014 left Afghanistan [warmuseum.ca(Canada and the War in Afghanistan)]

Considering that Canadian Forces were deployed internationally and were unable to defend against the outlined threat within its own borders, 50% is considered reasonable per capita spending for the 14 war-time years in Afghanistan. During peace time, or the remaining 8 years, I would ask for a refund of 100% minus the following proposed deduction: Defence may have protected against a greater threat and spending may be regarding as an insurance policy in this sense. If

Centre de santé mentale
Royal Ottawa
Mental Health Centre

PAGE: 2

UNIT #: 203438

NAME: WILSON, Allan

FAMILY PSYCHIATRIC HISTORY:

Mr. Wilson denies any family psychiatric history however on further questioning it appears his mother committed suicide when he was ten years old. He has no knowledge of her suffering from any mental illness.

MEDICAL HISTORY:

Mr. Wilson describes himself as medically well. There is no past history of significant head injury, seizure disorder, hypertension, dyslipidemia, and diabetes or thyroid abnormality. He is followed by a family physician for physical exams and blood work.

PERSONAL PSYCHIATRIC HISTORY:

Mr. Wilson describes himself as having no psychiatric illness prior to the year 2000, including symptoms of dysthymia or anxiety disorder. In 2000, Mr. Wilson developed [REDACTED]. He relates the onset of his symptoms to the death of a patient at the facility where he works as a clerk and describes delusional guilt related to feeling responsible for the patient's death. At that time he also had some auditory hallucinations and possibly some delusions of persecution. Prior to hospitalization, he described having problems with reduced sleep, anhedonia, poor energy, concentration, and appetite. He cut his neck and abdomen quite severely in a suicide attempt and was hospitalized for one month.

At that time Mr. Wilson was started on [REDACTED] 20 mg and [REDACTED] 7.5 mg. He indicates that they did try to increase [REDACTED] but he was not able to tolerate a higher dose. He remained well for about a month then elected to discontinue his medications. At that time in 2001 he developed similar symptoms of depression and sustained a fracture following a suicide attempt in jumping from a bridge. He was again hospitalized for one month and restarted on his medications.

Mr. Wilson has been followed by Dr. [REDACTED] since 2001 and sees her approximately every two to three months. [REDACTED] has been reduced by Dr. [REDACTED] from 7.5 to 5 mg, to 2.5 mg and then was eventually discontinued in November 2007. Since discontinuing [REDACTED], Mr. Wilson notes that he is sleeping less - although still 8 hours per night - and feels more alert but denies any recurrence of psychotic symptoms.

Mr. Wilson denies any side effects related to the [REDACTED] however he does have some concerns about being on this medication long term, especially related to his interest in joining the military for which being on psychiatric medication is a contraindication for

[REDACTED]

China, and Russia, have used ground and space-based technologies to target him with harmful radio and microwaves and monitor his thoughts and conversations. *See generally id.* Plaintiff also submitted a June 18, 2022, follow-up letter to Minister Anand wherein he claims that from 1985 to 2015 “Western militaries” targeted him from land and space using, among other things, “low-decibel voice harassment” and “mind exposure.” ECF No. 1-1 at 7-9. Plaintiff asserts that at least some portion of the unlawful surveillance he has been subjected to resulted from an unnamed crime he committed in 2000 and later in reaction to unspecified “abuses” he observed while employed by a government agency in 2009. ECF 1-1 at 3. Plaintiff, however, does not connect the purported surveillance abuses to FISA, nor does he ever claim a FISA warrant was ever issued against him.

As relief, Plaintiff requests a court order compelling the State Department to issue him a U.S. passport, an award of \$402 in legal fees, and an unspecified sum of money, including punitive damages, to discourage the State Department from depriving others of their constitutional rights in the future. Compl. at 5-6; *see also* ECF 11.

After filing his complaint, Plaintiff received State’s written denial of his passport application, which was dated January 9, 2023. ECF No. 8-2. On April 12, 2023, Plaintiff filed a supplement to his complaint wherein he reiterated State erred in denying his passport application with the result that Plaintiff suffered a wholesale “deprivation of rights, privileges, and immunities secured by the Constitution and law.” ECF 11; *see also* ECF 22. He also specified his punitive damages claim as \$2,377,500. *Id.* at 2.²

² In addition, Plaintiff submitted 19 pages of his personal medical records from the Royal Ottawa Mental Health Centre. ECF 1-1 at 10-29. Partially redacted, the medical records reveal Plaintiff has suffered from “auditory hallucinations,” *id.* at 10, 13, 16, and “delusions of persecution,” *id.* at 16, for which he has been hospitalized and medicated, *id.* at 11, 15, respectively).

defense has the knowledge and expertise to evaluate any foreign intelligence information that the Plaintiff may possess now or has in the past. If the Plaintiff were to possess such information, then the surveillance described would not be a conspiracy theory as the defense suggests, but rather ‘standard practice’ of security and intelligence organizations.

DEFAMATION

Plaintiff states in his letter to Canadian Minister Anita Anand that anecdotally it was ‘believed that the reason for targeting was suspicion of a crime’. Counsel states that in this correspondence, the Plaintiff admitted to committing an unnamed crime in the year 2000 (doc 27, p13, para1), when there is no evidence of such an admission. This was stated by the defense as fact and constitutes defamation, seeking to harm the reputation of the Plaintiff and forming a pattern of malicious intent:

- 1) a false statement purporting to be fact; 2) publication or communication of that statement to a third person; 3) fault amounting to at least negligence; and 4) damages; or some harm caused to the reputation of the person or entity who is the subject of the statement.

Counsel has also sought to further damage the Plaintiff’s credibility by stating as a matter of fact and record that the Plaintiff suffered ‘delusions of persecution’ (id at 16), when this reference only states the possibility of delusions. This is all in addition to the untrue accusation at the center of the written denial that prompted civil action, which was that the Plaintiff was not legitimated by his father. This accusation has since been proven false considering the ability of the Embassy to issue a passport in favor of the Plaintiff.

CONCLUSION

228 (1979); and (2) to address an Eighth Amendment violation involving failure to treat an inmate's asthma that resulted in his death, *Carlson v. Green*, 446 U.S. 14 (1980). While the contours of Plaintiff's *Bivens* claims are not entirely clear, assertions of harm from targeted radio waves and constitutional violations stemming from a denied passport application unquestionably arise in a wholly new context from those in which the Supreme Court has previously recognized a *Bivens* action. Under these circumstances, Plaintiff has failed to state a claim under *Bivens*.³

Finally, Plaintiff claims for the first time that Defendants have defamed him by imprecisely summarizing his possible criminal history and psychiatric diagnosis based on documents Plaintiff provided as part of his complaint. *See* ECF No. 28 at 11. Plaintiff cannot overcome a motion to dismiss by alleging new facts in a responsive pleading. *See, e.g., Harris v. District of Columbia*, 696 F. Supp. 2d 123, 136, 137 n.11 (D.D.C. 2010). Nor can Plaintiff amend his complaint "by the briefs in opposition to a motion to dismiss." *Kingman Park Civic Ass'n v. Gray*, 27 F. Supp. 3d 142, 160 n.7 (D.D.C. 2014). Lastly, even if Plaintiff were able to overcome the preceding hurdles, the FTCA specifically exempts defamation claims from the torts for which the government may be sued. 28 U.S.C. § 2680(h); *Cruz-Packer v. Chertoff*, 612 F. Supp. 2d 67, 69 n.3 (D.D.C. 2009). The court should therefore decline to entertain Plaintiff's claim to defamation.

³ In addition to the FTCA and *Bivens*, Plaintiff makes passing references to violations of the U.S. Constitution and 18 U.S.C. § 242. *See* ECF 28 at 4, 7. But without any coherent argument in support of these claims, Defendants are unable to respond and rest on their motion to dismiss. *See, e.g.,* Defs. Mot. at 16-17.

background). Aside from any of these considerations, a damage award is justifiable based on the denial of rights alone that were consequent to denial of Plaintiff's claim to citizenship, even without evident physical injury. The basis for monetary damages has already been demonstrated in amended filings (ECF doc 22, p7).

The defense of sovereign immunity may only be relevant if the grossly negligent denials described in the amended filing and exhibits are in fact 'Acts of State' for which immunity should be invoked, and not exclusively the errant actions of Embassy personnel under the auspices of the Department of State.

A defamation claim is not material to the complaint. In referring to counsel's defamation in their reply, Plaintiff seeks to establish the truth in response to counsel's false statements, while they have further stated in their reply that they are summarizing a 'psychiatric diagnosis' and 'possible criminal history', implying possession of unverifiable medical and criminal knowledge when there is no such known diagnosis or criminal history pertaining to the Plaintiff. The Plaintiff is not seeking to rephrase his complaint as the existing filing and its amendments are clearly worded and justification for damages is presented unequivocally.

Counsel is suggesting the need for a live nationality claim for the court to recognize damages for civil rights violations. This claim has already been denied multiple times for a period of 11 months. The demanded injunction for issuance of a passport was only satisfied by court filings days before the Defendant's response was due and no contact was made between the Defendant and the Plaintiff during that 11-month period. This accurately demonstrates the resulting merit of the case where the Plaintiff's demanded injunction was satisfied pretrial in the absence of any other administrative recourse for the Plaintiff to resolve the Embassy's erroneous rejection of a

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH INFORMATION SHEET

ALLAN DOUGLAS WILSON

Plaintiff(s)

VS

SERGIO SARKANY

Defendant(s)

Case Number: 2023-CAB-006048

Date: _____

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

Name: <i>(Please Print)</i> ALLAN DOUGLAS WILSON	Relationship to Lawsuit
Firm Name: NONE	☐ Attorney for Plaintiff
Telephone No.: DC Bar No.: (647) 490-1521	☒ Self (Pro Se)
	☐ Other: _____

TYPE OF CASE: ☐ Non-Jury

☒ 6 Person Jury

☐ 12 Person Jury

Demand: \$ 133,974.00

Other: PUBLICLY ISSUED APOLOGY

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: 1:23-cv-00216-CJN

Judge: Carl J. Nichols

Calendar #: _____

Case No.: _____

Judge: _____

Calendar #: _____

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

CONTRACT

- ☐ Breach of Contract
- ☐ Breach of Warranty
- ☐ Condo/Homeowner Assn. Fees
- ☐ Contract Enforcement
- ☐ Negotiable Instrument

COLLECTION/INS. SUB

- ☐ Debt Collection
- ☐ Insurance Subrogation
- ☐ Motion/Application for Judgment by Confession
- ☐ Motion/Application Regarding Arbitration Award

EMPLOYMENT DISPUTE

- ☐ Breach of Contract
- ☐ Discrimination
- ☐ Wage Claim
- ☐ Whistle Blower
- ☐ Wrongful Termination

REAL PROPERTY

- ☐ Condo/Homeowner Assn. Foreclosure
- ☐ Declaratory Judgment
- ☐ Drug Related Nuisance Abatement
- ☐ Ejectment
- ☐ Eminent Domain
- ☐ Interpleader
- ☐ Other
- ☐ Quiet Title
- ☐ Specific Performance

☐ FRIENDLY SUIT

☐ HOUSING CODE REGULATIONS

☐ QUI TAM

☐ STRUCTURED SETTLEMENTS

ADMINISTRATIVE PROCEEDINGS

- ☐ Administrative Search Warrant
- ☐ App. for Entry of Jgt. Defaulted Compensation Benefits
- ☐ Enter Administrative Order as Judgment
- ☐ Libel of Information
- ☐ Master Meter
- ☐ Petition Other

- ☐ Release Mechanics Lien
- ☐ Request for Subpoena

MALPRACTICE

- ☐ Medical – Other
- ☐ Wrongful Death

☐ APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT

AGENCY APPEAL

- ☐ Dangerous Animal Determination
- ☐ DCPS Residency Appeal
- ☐ Merit Personnel Act (OEA)
- ☐ Merit Personnel Act (OHR)
- ☐ Other Agency Appeal

Information Sheet, Continued

CIVIL ASSET FORFEITURE Currency Other Real Property Vehicle		TORT Abuse of Process Assault/Battery Conversion False Arrest/Malicious Prosecution Libel/Slander/Defamation Personal Injury Toxic Mass Wrongful Death (Non-Medical Malpractice)	
NAME CHANGE/VITAL RECORD AMENDMENT Birth Certificate Amendment Death Certificate Amendment Gender Amendment Name Change			
GENERAL CIVIL Accounting Deceit (Misrepresentation) Fraud Invasion of Privacy Lead Paint Legal Malpractice Motion/Application Regarding Arbitration Award Other - General Civil	Product Liability Request for Liquidation Writ of Replevin Wrongful Eviction CIVIL I/COMPLEX CIVIL Asbestos MORTGAGE FORECLOSURE Non-Residential Residential	STATUTORY CLAIM Anti – SLAPP Consumer Protection Act Exploitation of Vulnerable Adult Freedom of Information Act (FOIA) Other TAX SALE FORECLOSURE Tax Sale Annual Tax Sale Bid Off	
VEHICLE Personal Injury Property Damage	TRAFFIC ADJUDICATION APPEAL REQUEST FOR FOREIGN JUDGMENT		

Filer/Attorney's Signature

Date



Superior Court of the District of Columbia
CIVIL DIVISION – Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

Case No. 2023-CAB-006048

COMPLAINT

Jurisdiction of this Court is founded on D.C. Code § 11-921.

Allan Douglas Wilson

PLAINTIFF

74 General Maxilom Ave

Address (No Post Office Boxes)

Cebu City Cebu 6000

City State Zip Code

647-490-1521

Telephone Number

wilson.allan.d@gmail.com

Email Address (optional)

vs

SERGIO SARKANY

DEFENDANT

950 Pennsylvania Ave NW

Address (No Post Office Boxes)

Washington DC 20530

City State Zip Code

(202) 598-5624

Telephone Number

sergio.f.sarkany@usdoj.gov

Email Address (optional)

1. Write a short and plain statement of your claim, including any relevant facts, dates, and locations:

In D.C. District Court Case No. 1:23-cv-00216-CJN PACER Document 27 page 5, footnote 2, Defendant stated the Plaintiff was hospitalized and medicated for delusions. In the same document (p5, para1) Defendant accused Plaintiff of making a false confession of committing a crime. The Plaintiff's credibility has never been publicly questioned, nor has there been any criminal proceeding, diagnosis, or clinical evaluation to support the Defendant's false and defamatory statements. The libel was not related to the civil rights case and is not protected by attorney privilege. The statements could have been reasonably known to cause harm to the reputation of the Plaintiff.

2. What relief are you requesting from the Court? Include any request for money damages.

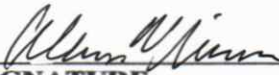
Compensatory damages: As a newly recognized U.S. citizen and for harm to potential employment opportunities, Plaintiff is seeking 1 year of salary in his chosen field: \$66,987 and corresponding punitive damages of \$66,987, totalling \$133,974 in addition to a publicly issued apology.

3. State any other information, of which the Court should be aware:

The written statements constituting libel were made pretrial and were distributed via PACER (Public Access to Court Electronic Records) which is known to be accessible by the public. The statements were made as a matter of record on September 8, 2023 and there is not yet a ruling on the case referenced in the Statement of Claim.

SIGNATURE

To the best of my knowledge, everything in this Complaint is true and I am not filing this Complaint to harass the Defendant(s). Superior Court Civil Rules 11(b).


SIGNATURE

SEP 26 2023
DATE

Subscribed and sworn to before me this _____ day of SEP 26 2023
signed on SEP 26 2023
Glenn I. Loop
Consular Agent
United States of America
(Notary Public/Deputy Clerk)
U.S. Consular Agency Cebu



INDEFINITE
COMMISSION



Superior Court of the District of Columbia

CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001

Telephone: (202) 879-1133 Website: www.dccourts.gov

ALLAN DOUGLAS WILSON

Plaintiff

vs.

SERGIO SARKANY

Defendant

Case Number 2023-CAB-006048

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

ALLAN DOUGLAS WILSON (PRO SE)

Name of Plaintiff's Attorney

c/o SAMEDAYPROCESS

Address

1413 K St NW 7th floor Washington DC 20005

647-490-1521

Telephone

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 원하 시면, (202) 879-4828로 전화주십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court

By

Deputy Clerk



Date

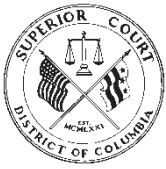
October 3, 2023

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL
Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
 contra _____

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

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

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

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____
 Subsecretario

Dirección _____

Fecha _____

Teléfono _____

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

반영을 원하시면 (202) 879-4828 로 전화하십시오

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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

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

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