

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Montgomery County
Republican Central Committee
15833 Crabbsbranch Way
Rockville, MD. 20853 *

(Full name and address of the plaintiff)

Plaintiff(s)

vs.

*

Civil No.:

(Leave blank. To be filled in by Court.)

RWT 15 CV 0845

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2015 MAR 26 PM 2:00

CLERK'S OFFICE
AT GREENBELT

BY BV DEPUTY

Michael Higgs, Esq.
Katie Bullock
Rakesh Kumar "Swight" Patel
Mark Uncapher, Esq.
12505 Park Potomac Ave, 6th Floor
Potomac, MD 20854

(Full name and address of the defendant(s))

Defendant(s)

*

COMPLAINT

1. Jurisdiction in this case is based on:

☐

Diversity (none of the defendants are residents of the state where plaintiff is a resident)

☒

Federal question (suit is based upon a federal statute or provision of the United States Constitution)

☐

Other (explain) _____

2. The facts of this case are:

The Montgomery County Republican Central Committee has been illegally seized, along with all of its assets, and are being abused in violation of Federal Election Law. The First Amendment and Due Process and Roberts Rules have been demolished. Financial Fraud and Theft is rampant and condoned. Child Pornography is routinely view, and such actions are vociferously condoned and protected. This present Legal Action of this Honorable Federal Court is desperately needed to protect the Montgomery County Republican Central Committee's remain assets and reputation from the defendants.

3. The relief I want the court to order is:

- ☐ Damages in the amount of: Emergency Order (Immediately)
- ☒ An injunction ordering: Transfer all assets and
Control to the Maryland State Republican Party,
- ☒ Other (explain) Order a Show Cause Hearing
to Have the State Party Retain the control
of the County Central Committee

3/24/15
(Date)


(Signature)

15833 Crabbs Branch
Rockville, Maryland
20853

301-922-2387
(Printed name, address and phone number of
Plaintiff)

Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DIVISION
GREENBELT, MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2015 MAR 26 PM 2:00

CLERK'S OFFICE
AT GREENBELT

**MONTGOMERY COUNTY REPUBLICAN
CENTRAL COMMITTEE**

15833 Crabbs Branch Way
Rockville, Maryland
20853

CASE #

Before

Plaintiff

THE HONORABLE

Vs.

**MICHAEL HIGGS
KATJA BULLOCK
RAKESHKUMAR "DWIGHT" PATEL &
MARK UNCAPHER**

12505 Park Potomac Avenue, 6th Floor
Potomac, Maryland
20854

Defendants

* * * * *

**COMPLAINT FOR EMERGENCY TEMPORARY RESTRAINING ORDER
&
COMPLAINT FOR JUDICIAL REVIEW FOR COURT ORDERED
FINANCIAL AUDIT BY THE STATE REPUBLICAN PARTY AND
SHOW CAUSE HEARING TO INVALIDATE THE CENTRAL
COMMITTEE LEADERSHIP ELECTION OF NOVEMBER 11th 2014**

I Adol Theo Owen-Williams, Jr. (hereinafter Owen-Williams), a duly elected member of the MONTGOMERY COUNTY REPUBLICAN CENTRAL COMMITTEE, (hereinafter MCRCC) do solemnly swear under the penalty of perjury that I am a duly elected Member of the Montgomery County Republican Central Committee, with a 35 year vested Financial, Political, and Fiduciary Liability in the welfare of the MCRCC, and that I am competent to testify in the above caption action; furthermore the contents of the statement set forth in this foregoing document presented to this Honorable District Court entitled "COMPLAINT FOR

EMERGENCY TEMPORARY RESTRAINING ORDER & COMPLAINT FOR JUDICIAL REVIEW FOR SHOW CAUSE HEARING TO INVALIDATE THE CENTRAL COMMITTEE ELECTION OF NOVEMBER 11th, 2014” are the absolute truth to the best of my knowledge, information, and belief. **PLEASE SEE EXHIBIT #1 (a) & (b).**

VENUE IS PROPER

This United States District Court venue is proper due the numerous violations of Federal Campaign Laws, and the fact that numerous and habitual acts of Interstate Financial Fraud and theft occurred.

GROUND FOR ACTION

Comes now Pro Se Plaintiff Owen-Williams and on behalf of the Montgomery County Maryland Republican Central Committee, pursuant to Maryland Rules 7-201, 7-202 and 2-305, seeks an EMERGENCY TEMPORARY RESTRAINING ORDER to be issued by this Honorable United States District Court to have any and all assets of the MCRCC transferred to the Guardianship of the Maryland State Republican Central Committee in Annapolis Maryland, including the guardianship of the Building at 15833 Branch Way, Rockville Maryland 20853 including all assets within the building and all Financial Assets such as the various Bank Accounts , pending the outcome of the Plaintiff's subsequent PLAINTIFF'S MOTION FOR COURT ORDERED FINANCIAL AUDIT BY THE STATE REPUBLICAN PARTY AND JUDICIAL REVIEW BY THE COURT FOR SHOW CAUSE HEARING TO INVALIDATE THE CENTRAL COMMITTEE ELECTION OF NOVEMBER 11th, 2014 due to, amongst others the following reasons:

Defendants' Criminal Financial Mismanagement, and Condoning of Financial Fraud, involving more than \$100,000 in Criminal & Fraudulent Financial Transactions, to the detriment of the MCRCC. **PLEASE SEE EXHIBIT #2 (a) (b) & (c)**

Defendants' Ardent and Habitual violations of the Roberts Rule as directed by both the State and County By-Laws so as to violate the First Amendment of the U.S. Constitution so as to unlawfully obtain positions of authority and furthermore abuse said authority.

Defendants' Failure to Disclose Criminal Financial Mismanagement, and Condoning Financial Fraud in violation of Federal Political Campaign Laws, involving more than \$100,000

in Criminal & Fraudulent Financial Transactions to the detriment of the MCRCC. Dozens of merchants continue to make efforts to collect from the MCRCC on Bad Checks on CLOSED ACCOUNTS, written by Dwight Patel and condoned by Defendants Michael Higgs, Katja Bullock, and Mark Uncapher.

Defendants' Failure to Perform the Duties of the Position for which they sought and held Office, in violation of the MCRCC By-Laws and to the detriment of the MCRCC.

Defendants' Failure to abide via the Federal Election Laws, State Laws, and County By-Laws, Governing the MCRCC & the Maryland State Central Committees, resulting in substantial and habitual violations and rampant Abuse of Authority, in violation of the MCRCC By-Laws and to the detriment of the MCRCC.

Defendants' Criminal Harboring and Condoning the Vile and Despicable Conduct of abusing MCRCC'S Assets to procure Child Pornography by Dwight Patel, in wanton violation of both Federal and State Laws, in addition to the MCRCC By-Laws, and to the detriment of the MCRCC.

It is for these reasons herein that, Pursuant to Maryland Rules 7-101 & 7-102, the MCRCC & Maryland State Central Committee's By-Laws, Owen-Williams seeks to protect the assets and residual reputation of the MCRCC by respectfully requesting that this Honorable Circuit Court issue a Temporary Restraining Order which preclude the Defendants from entering or using the assets of the MCRCC, and furthermore Orders that the Assets of the MCRCC be transferred to the Guardianship and Protection of the Maryland State Republican Central Committee Leadership at 95 Cathedral Street, Suite 100 Annapolis Maryland 21401 pending the results of the Plaintiff's subsequent Motion for a Judicial Review and Show Cause Hearing to Invalidate the unlawful Montgomery County Maryland Republican Central Committee Leadership Election of November 11th, 2014.

Respectfully Submitted



The Montgomery County Republican Central Committee
Adol T. Owen-Williams, Member
15833 Crabbs Branch Way
Rockville, Maryland
20853
(301)-922-2387