

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

<p>DISTRICT OF COLUMBIA, A MUNICIPAL CORPORATION, 400 6th Street, NW Washington, DC 20001,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>DEJENE A. ABEBE 2340 Carta Way Apt. 4003 Herndon, VA 20171,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. _____</p>
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COMPLAINT

The District of Columbia (the District) brings this action against Defendant Dejene A. Abebe under the Strengthening Traffic Enforcement, Education, and Responsibility Amendment Act of 2024 (STEER Act), D.C. Code § 50-2201.04(g)(1) and the Delinquent Debt Recovery Act, D.C. Code § 1-350.06(6), for numerous traffic infractions—many for dangerous and unsafe driving offenses—totaling \$58,608 in unpaid fines, penalties, and fees owed to the District. In support of its Complaint, the District states the following:

INTRODUCTION

1. Defendant Dejene A. Abebe is a threat to public safety. From July 2017 through October 2024, Defendant Abebe and her associated vehicle amassed 197 citations for traffic infractions across Defendant Abebe’s Virginia driver’s license and three different Virginia license plates. The vast majority of these citations—167—were accrued in a three-year period from 2021 through 2024. More than 80 percent of Defendant Abebe’s citations are for excessive speeding and other unsafe and dangerous driving in the District.

2. One hundred and sixty-three of Defendant's Abebe's 197 citations are for speeding. Of the 163 speeding citations, 107 citations are for driving 11-15 miles per hour above the speed limit, and 41 citations are for driving 16-20 miles per hour above the speed limit.

3. Additionally, of the 163 citations for speeding, 15 citations are for driving at speeds that constitute reckless driving, or driving 20 miles per hour or more above the speed limit. D.C. Code § 50-2201.04(b)(1).

4. Rather than resolve or pay the thousands of dollars in tickets she has amassed in just three years, Defendant Abebe has acted as if there are no consequences for her lawlessness. As of the filing date, Defendant Abebe owes the District \$58,608 in unpaid fines, penalties, and fees for her unsafe driving.

5. The District brings this action to hold Defendant Abebe accountable for her long history of unsafe driving, collect money she owes the District, and ensure she stops endangering others and threatening public safety.

JURISDICTION

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

7. This Court has personal jurisdiction over Defendant Abebe under D.C. Code § 13-423(a)(3) because Defendant Abebe or an authorized driver was driving Defendant Abebe's vehicle in the District when the underlying traffic infractions occurred, and under D.C. Code § 50-2201.04(g)(1)(A).

PARTIES

8. Plaintiff the District of Columbia, a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government

of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General conducts the District's legal business and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1).

9. Defendant Dejene A. Abebe resides in the State of Virginia at 2340 Carta Way Apt. 4003, Herndon, VA 20171.

10. Defendant Abebe is the sole, registered owner of a vehicle that is associated with three distinct Virginia license plates.

11. Defendant Abebe holds a Virginia driver's license.

12. Defendant Abebe received numerous traffic citations on each of the Virginia license plates and her Virginia driver's license that have accumulated fines, penalties, and fees because of her nonpayment.

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

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

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

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

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

16. An individual who receives a Notice of Infraction may answer it by: (1) paying the fine; (2) admitting with an explanation; or (3) denying the infraction. D.C. Code §§ 50-2302.05(a), 2303.05(a)(1).

17. A civil fine for a traffic infraction varies based on the established amount for the offense. D.C. Code § 50-2301.05(a)(1); *see, e.g.*, 18 DCMR §§ 2600, 2601. A penalty equal to the civil fine is imposed on an individual who fails to answer a Notice of Infraction within 30 calendar days of the notice issuance date. D.C. Code §§ 50-2302.05(d), 2303.05(d)(1).

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

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

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

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

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

22. CCU imposes a 20 percent collection fee to delinquent debt owed from an unpaid traffic ticket. *Central Collection Unit Fee*, District of Columbia OCFO, https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/CCU%20Fee_Assignment.pdf, (last visited Feb. 10, 2025).

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

24. ETIMS is equipped to retrieve information from various electronic systems within the District, Maryland, and Virginia, which includes the names and addresses of registered license plate owners.

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

³ Delinquent Debt is any financial obligation owed to the District by an individual that remains unpaid more than 90 days after it due. D.C. Code § 1-350.01.

26. CCU contracts with Harris & Harris, Ltd. (Harris & Harris), a third-party collection agency, to collect delinquent debt owed to the District. Harris & Harris communicates with debtors in the form of letters and phone calls to collect delinquent debt. Harris & Harris uses an electronic database that captures every attempt made to collect debt and every communication sent to and received from a debtor. The system also captures the total debt in collections that includes all fines, penalties and fees.

DEFENDANT DEJENE ABEBE'S OUTSTANDING TRAFFIC INFRACTIONS

27. CCU conducted an eTIMS search of Defendant Abebe's traffic infractions associated with her driver's license number and all license plate numbers registered in her name.

28. Defendant Abebe holds a Virginia driver's license number **VAB69617101**.

29. The District issued the following traffic citations to Defendant Abebe under driver's license number **VAB69617101**:

Ticket #	Status/ Date	Issued On	ViolationCode/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
294885511	 UNPAID 04/04/2024	04/04/2024 02:08PM	T107 NO YIELD RIGHT WAY	JEEP	BLOCK 11TH ST AND H ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
294885522	 UNPAID 04/04/2024	04/04/2024 02:08PM	T658 REG FAIL TO EXHIBIT	JEEP	BLOCK 11TH ST AND H ST NW 013:DEEMED LIABLE	\$50.00	\$70.00	\$120.00
281181983	 UNPAID 05/09/2023	05/09/2023 12:30AM	T128 STOP SIGN, PASSING	JEEP	2700 K ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
294671134	 UNPAID 02/18/2023	02/18/2023 01:40AM	T013 ATTENTION NO/OPER VEH	JEEP	3400 ST NW 013:DEEMED LIABLE	\$25.00	\$35.00	\$60.00
7917798280	 UNPAID 09/30/2022	09/30/2022 08:47AM	T591 CELL PHNE OTH DEVICE	JEEP	INTERSECTION K ST NW EASTBOUND @2* 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
7917798276	 UNPAID 09/30/2022	09/30/2022 08:46AM	T113 SIGNAL PASS REDLIGHT	JEEP	INTERSECTION K ST NW EASTBOUND @2* 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
7909461313	 UNPAID 05/26/2021	05/26/2021 06:08PM	T113 SIGNAL PASS REDLIGHT	JEEP	AT 3200 M ST NW EASTBOUND @33RD ST* 013:DEEMED LIABLE	\$150.00	\$30.00	\$180.00
7914079445	 UNPAID 03/17/2021	03/17/2021 05:06PM	T334 FAIL CMPL STOP RONRD	JEEP	INTERSECTION 4TH ST NW SOUTHBOUND* 013:DEEMED LIABLE	\$100.00	\$20.00	\$120.00
7910207616	 UNPAID 09/25/2020	09/25/2020 08:22PM	T185 TURN FROM WRONG LANE	JEEP	INTERSECTION 7TH ST NW NORTHBOUND* 033:LIABL FAIL TO APPEAR	\$100.00	\$20.00	\$120.00

30. DMV records currently reflect that Defendant Abebe has nine delinquent traffic citations issued to her driver's license, totaling \$1,680.

31. DMV records reflect that, of the nine delinquent traffic citations, all but one are for dangerous driving. Of those nine citations two citations are for running red lights, one citation is

for running a stop sign, one citation is for failing to yield, one citation is failing to pay attention while driving, one is for using a cell phone while driving, one is for failing to stop completely before turning, and one is for turning from the wrong lane

32. Defendant Abebe has either failed to answer or resolve these traffic tickets, and thus liable for all fines, penalties, and fees for these traffic tickets.

33. Defendant Abebe is the sole registered owner of three distinct Virginia license plates on which she owes delinquent debt: **VAUJK1213**, **VAVJB8480**, and **VAB69617101**.

34. All license plates are associated with a 2015 Jeep Renegade Latitude with vehicle identification number (VIN) ZACCJABT9FPB98622.

35. The District issued the following traffic citations to Defendant Abebe under license plate number **VAUJK1213**⁴:

F193237561		UNPAID 10/06/2024	10/06/2024 03:25AM	T119 SPEED 11-15 OVR LIMT	JEEP	UNIT BLK H ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F193123289		UNPAID 10/04/2024	10/04/2024 11:08PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F192239506		UNPAID 09/23/2024	09/23/2024 08:55PM	T119 SPEED 11-15 OVR LIMT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
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F191164440		UNPAID 09/11/2024	09/11/2024 09:08AM	T119 SPEED 11-15 OVR LIMT	JEEP	1900 BLK INDEPENDENCE AVE SE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F190475494		UNPAID 09/03/2024	09/03/2024 10:46PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F184601374		UNPAID 06/29/2024	06/29/2024 08:53PM	T119 SPEED 11-15 OVR LIMT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F184606327		UNPAID 06/29/2024	06/29/2024 11:56PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F183725418		UNPAID 06/21/2024	06/21/2024 12:18PM	T119 SPEED 11-15 OVR LIMT	JEEP	700 BLK N CAPITOL ST NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F183726932		UNPAID 06/21/2024	06/21/2024 12:40PM	T119 SPEED 11-15 OVR LIMT	JEEP	2800 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00

⁴ Ticket numbers D028226513, F127245439, F126957788, F158494962, F198351560 and F196217680 have not been referred to CCU. Thus, the tickets are not included in this civil suit.

F182273749		UNPAID	06/07/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179720478		UNPAID	05/11/2024	T119	JEEP	500 BLK MASSACHUSETTS AVE NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179775408		UNPAID	05/11/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179665595		UNPAID	05/10/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179602133		UNPAID	05/10/2024	T119	JEEP	2400 BLK WISCONSIN AVE NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179673750		UNPAID	05/11/2024	T119	JEEP	200 BLK H ST NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F179402850		UNPAID	05/07/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8266929834		UNPAID	05/15/2024	P031	JEEP	1200 BLOCK 1ST ST SE WEST SIDE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F178912889		UNPAID	05/02/2024	T119	JEEP	1500 BLK 7TH ST NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F178699796		UNPAID	04/30/2024	T120	JEEP	2200 BLK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F178290745		UNPAID	04/26/2024	T120	JEEP	2200 BLK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D042392980		UNPAID	04/19/2024	P007	JEEP	NB 400 BLOCK OF 8TH ST SE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F177111113		UNPAID	04/13/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D042240081		UNPAID	04/12/2024	T113	JEEP	K ST W/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F175827041		UNPAID	03/29/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F175827082		UNPAID	03/29/2024	T119	JEEP	2200 BLK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D040604312		UNPAID	03/02/2024	T128	JEEP	MASSACHUSETTS AVE E/B @ FORT DAVIS 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F172294354		UNPAID	02/01/2024	T120	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F172167653		UNPAID	01/30/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F172110456		UNPAID	01/30/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F171921175		UNPAID	01/26/2024	T119	JEEP	200 BLK H ST NE E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F171266659		UNPAID	01/13/2024	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F170863437		UNPAID	01/06/2024	T120	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00

F170528769		UNPAID	12/31/2023	T119		JEEP	3200 BLK ALABAMA AVE SE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F169736075		UNPAID	12/19/2023	T119	SPEED 11-15 OVR LIMIT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8260224582		UNPAID	12/28/2023	P031		JEEP	UNIT BLOCK K ST SE SOUTH SIDE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8259862376		UNPAID	12/05/2023	P020		JEEP	1000 BLOCK WISCONSIN AVE NW WEST* 013:DEEMED LIABLE	\$50.00	\$70.00	\$120.00
F167787312		UNPAID	11/19/2023	T119		JEEP	3200 BLK ALABAMA AVE SE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F167785865		UNPAID	11/19/2023	T119		JEEP	3100 BLK ALABAMA AVE SE NE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F167789010		UNPAID	11/19/2023	T119		JEEP	2200 BLK IRVING ST SE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F167203098		UNPAID	11/08/2023	T119		JEEP	1900 BLK SOUTHERN AVE SE NE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F167201544		UNPAID	11/08/2023	T120		JEEP	3700 BLK SOUTHERN AVE SE SW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F166943711		UNPAID	11/04/2023	T119		JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F166742102		UNPAID	10/30/2023	T119		JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F166102196		UNPAID	10/18/2023	T120		JEEP	2900 BLK ARIZONA AVE NW S/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F165500191		UNPAID	10/02/2023	T121		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F165255971		UNPAID	09/26/2023	T119		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F165110128		UNPAID	09/22/2023	T120		JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F164939275		UNPAID	09/18/2023	T119		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F164585510		UNPAID	09/10/2023	T119		JEEP	2200 BLK IRVING ST SE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F164472630		UNPAID	09/08/2023	T119		JEEP	1300 BLK 9TH ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F163782565		UNPAID	08/24/2023	T119		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D035355276		UNPAID	08/16/2023	T334		JEEP	K ST W/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F163225890		UNPAID	08/11/2023	T121		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F162875007		UNPAID	08/04/2023	T120		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F162861364		UNPAID	08/03/2023	T119		JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00

F162435800		UNPAID	07/23/2023	T120	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F162405967		UNPAID	07/22/2023	T120	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F162108682		UNPAID	07/18/2023	T119	JEEP	1300 BLK 9TH ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8254866270		UNPAID	07/22/2023	P055	JEEP	1800 BLOCK 13TH ST NW EAST SIDE 013:DEEMED LIABLE	\$30.00	\$42.00	\$72.00
F161036688		UNPAID	07/12/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F161386064		UNPAID	07/03/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F160993559		UNPAID	06/26/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157261617		UNPAID	04/06/2023	T121	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F157206403		UNPAID	04/04/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157167519		UNPAID	04/03/2023	T120	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F157173125		UNPAID	04/04/2023	T121	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F157134875		UNPAID	04/02/2023	T120	JEEP	3700 BLK SOUTHERN AVE SE SW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F157082377		UNPAID	04/01/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157080158		UNPAID	04/01/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157032900		UNPAID	03/31/2023	T120	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F156995345		UNPAID	03/30/2023	T121	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F156914755		UNPAID	03/28/2023	T120	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F156888062		UNPAID	03/28/2023	T119	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157308783		UNPAID	04/07/2023	T121	JEEP	3300 BLK NEW YORK AVE NE E/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F157330347		UNPAID	04/07/2023	T119	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F158494862		UNPAID	05/05/2023	T119	JEEP	2500 BLK MARTIN LUTHER KING AVE SE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F159903822		UNPAID	05/30/2023	T119	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F158949010		UNPAID	05/16/2023	T119	JEEP	3RD ST TUNNEL NW S/B BY 3RD ST 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
			05/16/2023	05:24PM					

F158360251		UNPAID 05/03/2023	05/03/2023 09:04AM	T822 OVER 25 MPH CONTROL	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$400.00	\$560.00	\$960.00
F157669841		UNPAID 04/15/2023	04/15/2023 10:50PM	T119 SPEED 11-15 OVR LIMT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157619168		UNPAID 04/14/2023	04/14/2023 09:36PM	T119 SPEED 11-15 OVR LIMT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F157541761		UNPAID 04/13/2023	04/13/2023 12:14AM	T120 SPEED 16-20 OVR LIMT	JEEP	POTOMAC RIVER FWY NW/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F155104048		UNPAID 02/12/2023	02/12/2023 10:25AM	T119 SPEED 11-15 OVR LIMT	JEEP	4800 BLK S DAKOTA AVE NE NW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D033884047		UNPAID 02/10/2023	02/10/2023 05:06PM	T113 SIGNAL PASS REDLIGHT	JEEP	K ST W/B @ 25TH ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F154719378		UNPAID 02/02/2023	02/02/2023 09:23AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F154575206		UNPAID 01/28/2023	01/28/2023 11:58PM	T119 SPEED 11-15 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F153096817		UNPAID 12/18/2022	12/18/2022 01:59AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F152841528		UNPAID 12/09/2022	12/09/2022 10:11AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F152200800		UNPAID 11/18/2022	11/18/2022 08:31AM	T121 SPEED 21-25 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F152103051		UNPAID 11/14/2022	11/14/2022 08:37AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F150673435		UNPAID 10/01/2022	10/01/2022 01:50AM	T119 SPEED 11-15 OVR LIMT	JEEP	1300 BLK 9TH ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F149598040		UNPAID 08/29/2022	08/29/2022 08:23AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F149457569		UNPAID 08/26/2022	08/26/2022 12:21AM	T120 SPEED 16-20 OVR LIMT	JEEP	1300 BLK 9TH ST NW S/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F149380258		UNPAID 08/23/2022	08/23/2022 06:53PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F149432643		UNPAID 08/25/2022	08/25/2022 08:46AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F148821121		UNPAID 08/09/2022	08/09/2022 08:27AM	T822 OVER 25 MPH CONTROL	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$400.00	\$560.00	\$960.00
F148651586		UNPAID 08/05/2022	08/05/2022 08:57AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F147199032		UNPAID 07/01/2022	07/01/2022 07:51PM	T120 SPEED 16-20 OVR LIMT	JEEP	1300 BLK EASTERN AVE NE NW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F147120302		UNPAID 06/30/2022	06/30/2022 08:00PM	T120 SPEED 16-20 OVR LIMT	JEEP	4900 BLK 16TH ST NW N/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F145900356		UNPAID 06/02/2022	06/02/2022 07:03PM	T119 SPEED 11-15 OVR LIMT	JEEP	2600 BLK LINCOLN RD NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145940891		UNPAID 06/03/2022	06/03/2022 07:48PM	T119 SPEED 11-15 OVR LIMT	JEEP	4900 BLK 16TH ST NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145944565		UNPAID 06/03/2022	06/03/2022 10:44PM	T119 SPEED 11-15 OVR LIMT	JEEP	3RD ST TUNNEL NW S/B BY 3RD ST 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145582311		UNPAID 05/26/2022	05/26/2022 06:53PM	T119 SPEED 11-15 OVR LIMT	JEEP	3000 BLK PENNSYLVANIA AVE SE NW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145514290		UNPAID 05/24/2022	05/24/2022 07:45PM	T121 SPEED 21-25 OVR LIMT	JEEP	1400 BLK BLADENSBURG RD NE S/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F145552785		UNPAID 05/25/2022	05/25/2022 07:29PM	T120 SPEED 16-20 OVR LIMT	JEEP	2800 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00

D031872464		UNPAID	05/25/2022	T113 SIGNAL PASS REDLIGHT	JEEP	N CAPITOL ST S/B @ H ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F145486734		UNPAID	05/23/2022	T119 SPEED 11-15 OVR LIMT	JEEP	5800 BLK NEW HAMPSHIRE AVE NE SW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F145264961		UNPAID	05/18/2022	T120 SPEED 16-20 OVR LIMT	JEEP	4300 BLK RESERVOIR RD NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F145234411		UNPAID	05/17/2022	T120 SPEED 16-20 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F144977528		UNPAID	05/11/2022	T823 OVER 25 MPH NON CONT	JEEP	4600 BLK BLAGDEN AVE NW SW/B 013:DEEMED LIABLE	\$500.00	\$700.00	\$1200.00
F144977016		UNPAID	05/11/2022	T121 SPEED 21-25 OVR LIMT	JEEP	1300 BLK EASTERN AVE NE NW/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F144725596		UNPAID	05/05/2022	T120 SPEED 16-20 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F144787232		UNPAID	05/07/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D031734570		UNPAID	05/10/2022	T334 FAIL CMPL STOP RONRD	JEEP	12TH ST N/B @ CONSTITUTION AVE NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F144543651		UNPAID	05/02/2022	T119 SPEED 11-15 OVR LIMT	JEEP	400 BLK RHODE ISLAND AVE NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F144052675		UNPAID	04/19/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F142823868		UNPAID	03/18/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D031168714		UNPAID	03/14/2022	T113 SIGNAL PASS REDLIGHT	JEEP	NEW YORK AVE SW/B @ N CAPITOL ST NE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F142182213		UNPAID	02/27/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D030909478		UNPAID	02/18/2022	T113 SIGNAL PASS REDLIGHT	JEEP	N CAPITOL ST S/B @ GALLATIN ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F141701024		UNPAID	02/14/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F141309564		UNPAID	02/03/2022	T121 SPEED 21-25 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$200.00	\$280.00	\$480.00
F141158816		UNPAID	01/27/2022	T119 SPEED 11-15 OVR LIMT	JEEP	600 BLK NEW YORK AVENUE NE W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F140934584		UNPAID	01/22/2022	T119 SPEED 11-15 OVR LIMT	JEEP	600 BLK MISSOURI AVE NW SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F140617620		UNPAID	01/14/2022	T120 SPEED 16-20 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F140616828		UNPAID	01/14/2022	T119 SPEED 11-15 OVR LIMT	JEEP	2300 BLK N CAPITOL ST NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F140581450		UNPAID	01/12/2022	T120 SPEED 16-20 OVR LIMT	JEEP	1100 BLK BLADENSBURG RD NE NE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F140589498		UNPAID	01/14/2022	T120 SPEED 16-20 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F140169524		UNPAID	12/28/2021	T119 SPEED 11-15 OVR LIMT	JEEP	1400 BLK N CAPITOL ST NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F139534044		UNPAID	12/07/2021	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F138977562		UNPAID	11/16/2021	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F138653339		UNPAID	11/04/2021	T120 SPEED 16-20 OVR LIMT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D030005673		UNPAID	10/30/2021	T113 SIGNAL PASS REDLIGHT	JEEP	CONNECTICUT AVE S/B @ PORTER ST NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F138609878		UNPAID	11/02/2021	T120 SPEED 16-20 OVR LIMT	JEEP	1400 BLK N CAPITOL ST NE N/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F138435320		UNPAID	10/27/2021	T119 SPEED 11-15 OVR LIMT	JEEP	1600 BLK NEW JERSEY AVE NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D029947507		UNPAID	10/20/2021	T113 SIGNAL PASS REDLIGHT	JEEP	NEW YORK AVE SW/B @ N CAPITOL ST NE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F138205253		UNPAID	10/19/2021	T119 SPEED 11-15 OVR LIMT	JEEP	2000 BLK BRANCH AVE SE S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F138073409		UNPAID	10/15/2021	T120 SPEED 16-20 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F137833454		UNPAID	10/08/2021	T120 SPEED 16-20 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F137618279		UNPAID	09/30/2021	T119 SPEED 11-15 OVR LIMT	JEEP	6600 BLK BLAIR RD NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F137649506		UNPAID	10/01/2021	T119 SPEED 11-15 OVR LIMT	JEEP	1300 BLK NEW JERSEY AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00

F137212937		UNPAID 09/17/2021	09/17/2021 10:22PM	T120 SPEED 16-20 OVR LIMT	JEEP	3RD ST TUNNEL NW S/B BY 3RD ST 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F136984111		UNPAID 09/11/2021	09/11/2021 11:43AM	T120 SPEED 16-20 OVR LIMT	JEEP	3000 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F136011591		UNPAID 08/18/2021	08/18/2021 09:16PM	T119 SPEED 11-15 OVR LIMT	JEEP	3RD ST TUNNEL NW N/B BY MA AVE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D029595256		UNPAID 08/23/2021	08/23/2021 09:16PM	T113 SIGNAL PASS REDLIGHT	JEEP	NEW YORK AVE SW/B @ N CAPITOL ST NE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D029511446		UNPAID 08/11/2021	08/11/2021 08:32PM	T128 STOP SIGN, PASSING	JEEP	KANSAS AVE NE/B @ BUCHANAN ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F135538904		UNPAID 08/07/2021	08/07/2021 10:50AM	T120 SPEED 16-20 OVR LIMT	JEEP	600 BLK KENILWORTH AVE NE S/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F135526548		UNPAID 08/07/2021	08/07/2021 12:35PM	T119 SPEED 11-15 OVR LIMT	JEEP	2300 BLK N CAPITOL ST NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F135325507		UNPAID 08/02/2021	08/02/2021 07:34PM	T119 SPEED 11-15 OVR LIMT	JEEP	3RD ST TUNNEL NW N/B BY MA AVE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F135212082		UNPAID 07/31/2021	07/31/2021 10:21AM	T120 SPEED 16-20 OVR LIMT	JEEP	3RD ST TUNNEL NW N/B BY MA AVE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F135129833		UNPAID 07/29/2021	07/29/2021 06:26PM	T822 OVER 25 MPH CONTROL	JEEP	3RD ST TUNNEL NW N/B BY MA AVE 013:DEEMED LIABLE	\$400.00	\$560.00	\$960.00
F132524718		UNPAID 06/07/2021	06/07/2021 10:30PM	T120 SPEED 16-20 OVR LIMT	JEEP	3RD ST TUNNEL NW N/B BY MA AVE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D029003168		UNPAID 06/04/2021	06/04/2021 09:01PM	T113 SIGNAL PASS REDLIGHT	JEEP	NEW YORK AVE SW/B @ N CAPITOL ST NE 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F132133601		UNPAID 05/31/2021	05/31/2021 04:26PM	T120 SPEED 16-20 OVR LIMT	JEEP	3600 BLK EASTERN AVE NE SE/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F132105978		UNPAID 05/31/2021	05/31/2021 10:51AM	T823 OVER 25 MPH NON CONT	JEEP	2800 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$500.00	\$700.00	\$1200.00
F131433868		UNPAID 05/17/2021	05/17/2021 09:57PM	T119 SPEED 11-15 OVR LIMT	JEEP	2800 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F131184845		UNPAID 05/12/2021	05/12/2021 08:31AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F130920961		UNPAID 05/06/2021	05/06/2021 08:37AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D028784541		UNPAID 05/07/2021	05/07/2021 04:52PM	T334 FAIL CMPL STOP RONRD	JEEP	14TH ST S/B @ U ST NW 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F130592591		UNPAID 04/29/2021	04/29/2021 06:29PM	T119 SPEED 11-15 OVR LIMT	JEEP	2800 BLK N CAPITOL ST NW S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129913199		UNPAID 04/14/2021	04/14/2021 07:15PM	T119 SPEED 11-15 OVR LIMT	JEEP	3RD ST TUNNEL NW S/B BY 3RD ST 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129352309		UNPAID 04/02/2021	04/02/2021 05:48PM	T119 SPEED 11-15 OVR LIMT	JEEP	600 BLK MISSOURI AVE NW SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129280154		UNPAID 03/31/2021	03/31/2021 10:24PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129008667		UNPAID 03/25/2021	03/25/2021 03:40PM	T119 SPEED 11-15 OVR LIMT	JEEP	2600 BLK LINCOLN RD NE N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F129092045		UNPAID 03/27/2021	03/27/2021 01:13PM	T119 SPEED 11-15 OVR LIMT	JEEP	600 BLK MISSOURI AVE NW SE/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F128730210		UNPAID 03/18/2021	03/18/2021 06:16PM	T119 SPEED 11-15 OVR LIMT	JEEP	5800 BLK NEW HAMPSHIRE AVE NE SW/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F128150949		UNPAID 03/04/2021	03/04/2021 05:52PM	T119 SPEED 11-15 OVR LIMT	JEEP	4400 BLK CLERMONT DR NE S/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F127929680		UNPAID 02/25/2021	02/25/2021 10:42PM	T120 SPEED 16-20 OVR LIMT	JEEP	2200 BLK K ST NW W/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
D028226513		UNPAID 02/15/2021	02/15/2021 10:15PM	T113 SIGNAL PASS REDLIGHT	JEEP	N CAPITOL ST N/B @ RIGGS RD NE	\$150.00	\$150.00	\$300.00
F127245439		UNPAID 02/04/2021	02/04/2021 10:38PM	T119 SPEED 11-15 OVR LIMT	JEEP	2900 BLK MILITARY RD NW E/B	\$100.00	\$100.00	\$200.00
F126957788		UNPAID 01/22/2021	01/22/2021 10:41PM	T120 SPEED 16-20 OVR LIMT	JEEP	2800 BLK N CAPITOL ST NW S/B	\$150.00	\$150.00	\$300.00

36. DMV records currently reflect that Defendant Abebe has 167 delinquent traffic citations issued to this license plate, totaling \$51,672.

37. During a short three-year window from 2021 to 2024, Defendant Abebe amassed 148 of the citations for excessive speeding in the District. In 2023 alone, Defendant Abebe received 48 citations for speeding. Of the 148 citations for speeding, 97 citations were issued for driving 11-15 miles per hour above the speed limit, and 36 citations were issued for driving 16-20 miles per hour above the speed limit.

38. Additionally, of the 148 citations for speeding, 15 citations are for driving at speeds that would constitute reckless driving, or driving 20 miles per hour or more over the speed limit. D.C. Code § 50-2201.04(b)(1).

39. Defendant Abebe also received traffic citations for other dangerous and unsafe driving infractions. Of the 167 traffic citations issued on this license plate, nine citations were issued for running red lights, and two were issued for running stop signs.

40. Defendant Abebe failed to answer and thus was deemed liable for all fines, penalties, and fees for these traffic infractions.

41. As of the filing date, Defendant Abebe owes the District \$51,672 for traffic citations issued under license plate **VAUJK1213**.

42. The District issued the following traffic citations to Defendant Abebe under license plate number **VAVJB8480**:

F111779139		UNPAID 01/30/2020	01/30/2020 10:41PM	T119 SPEED 11-15 OVR LIMT	JEEP	3rd St Tunnel NW s/b by 3rd St 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F111776881		UNPAID 01/30/2020	01/30/2020 08:39PM	T119 SPEED 11-15 OVR LIMT	JEEP	600 blk Missouri Ave NW se/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
D025952128		UNPAID 01/24/2020	01/24/2020 11:06PM	T113 SIGNAL PASS REDLIGHT	JEEP	N Capitol St s/b @ Gallatin St NW 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F111342754		UNPAID 01/15/2020	01/15/2020 08:29PM	T120 SPEED 16-20 OVR LIMT	JEEP	3rd St Tunnel NW n/b by MA Ave 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F110796993		UNPAID 12/27/2019	12/27/2019 07:00PM	T119 SPEED 11-15 OVR LIMT	JEEP	2900 blk Military Rd NW e/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F110288367		UNPAID 12/11/2019	12/11/2019 07:53AM	T119 SPEED 11-15 OVR LIMT	JEEP	4300 blk Reservoir Rd NW e/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F109231263		UNPAID 11/12/2019	11/12/2019 10:04PM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 blk South Dakota Ave NE se/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F108766872		UNPAID 11/01/2019	11/01/2019 07:53PM	T119 SPEED 11-15 OVR LIMT	JEEP	600 blk Missouri Ave NW se/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F106343329		UNPAID 09/06/2019	09/06/2019 07:14PM	T120 SPEED 16-20 OVR LIMT	JEEP	3100 blk 4th St NE n/b 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
8205870024		UNPAID 06/21/2019	06/21/2019 04:12PM	P259 NO STP/STND PM RUSH	JEEP	1100 BLOCK NORTH CAPITOL ST NE E* 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F101728429		UNPAID 06/11/2019	06/11/2019 07:33PM	T119 SPEED 11-15 OVR LIMT	JEEP	2600 blk Lincoln Rd NE n/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8196945853		UNPAID 11/06/2018	11/06/2018 07:48AM	P055 NO PARKING ANYTIME	JEEP	2200 BLOCK 10TH ST NW EAST SIDE 013:DEEMED LIABLE	\$30.00	\$42.00	\$72.00
8183061762		UNPAID 01/25/2018	01/25/2018 01:48PM	P031 LOADING ZONE	JEEP	1300 BLOCK T ST NW SOUTH SIDE 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8178652576		UNPAID 10/03/2017	10/03/2017 12:35PM	P039 EXPIRED METER	JEEP	1900 BLOCK 9TH ST NW WEST SIDE 013:DEEMED LIABLE	\$30.00	\$42.00	\$72.00
F076899488		UNPAID 08/16/2017	08/16/2017 08:00AM	T119 SPEED 11-15 OVR LIMT	JEEP	2200 block K St NW e/b 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
8177084484		UNPAID 08/17/2017	08/17/2017 05:37PM	P012 DISOBYING OFFICL SIGN	JEEP	1800 BLOCK 8TH ST NW WEST SIDE 013:DEEMED LIABLE	\$30.00	\$42.00	\$72.00
F075665587		UNPAID 07/20/2017	07/20/2017 07:46AM	T120 SPEED 16-20 OVR LIMT	JEEP	2200 block K St NW e/b 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00

43. DMV records currently reflect that Defendant Abebe has 17 delinquent traffic citations issued to this license plate, totaling \$4,056.

44. DMV records reflect that, of the 17 traffic citations, 12 citations were for unsafe and dangerous driving infractions. Of those citations, eight traffic citations were issued for driving 11-15 miles per hour above the speed limit; three traffic citations were issued for driving 16-20 miles per hour above the speed limit; and one traffic citation was issued for running a red light.

45. Defendant Abebe failed to answer and was thus deemed liable for all fines, penalties, and fees for these traffic infractions.

46. As of the filing date, Defendant Abebe owes the District \$4,056 for traffic citations issued under license plate **VAVJB8480**.

47. The District issued the following traffic citations to Defendant Abebe under license plate number **VAU23298**:

Ticket #	Status/ Date	Issued On	Violation Code/ Description	Make	Location/ Disposition	Fine Amt.	Penalties	Total Due
F126298729	 UNPAID 01/07/2021	01/07/2021 10:09PM	T119 SPEED 11-15 OVR LIMIT	JEEP	2600 BLK WISCONSIN AVE NW N/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00
F126179789	 UNPAID 01/04/2021	01/04/2021 08:18AM	T120 SPEED 16-20 OVR LIMIT	JEEP	2200 BLOCK K ST NW E/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F126135108	 UNPAID 01/02/2021	01/02/2021 04:49PM	T120 SPEED 16-20 OVR LIMIT	JEEP	3900 BLK SOUTH DAKOTA AVE NE NW/B 013:DEEMED LIABLE	\$150.00	\$210.00	\$360.00
F126059834	 UNPAID 12/31/2020	12/31/2020 05:35PM	T119 SPEED 11-15 OVR LIMIT	JEEP	2900 BLK MILITARY RD NW E/B 013:DEEMED LIABLE	\$100.00	\$140.00	\$240.00

48. DMV records currently reflect that Defendant Abebe has four delinquent traffic citations issued under this license plate, totaling \$1,200.

49. DMV records reflect that all citations were for dangerous driving. All citations were issued for driving 11-15 miles per hour above the speed limit.

50. Defendant Abebe failed to answer and was thus deemed liable for all fines, penalties, and fees for these traffic infractions.

51. As of the filing date, Defendant Abebe owes the District \$1,200 for traffic citations issued under license plate **VAU23298**.

52. In total, Defendant Abebe has 202 delinquent traffic citations and owes the District \$59,928 in outstanding debt for failure to answer or otherwise pay the fines, penalties, and fees associated with her driver's license and registered license plates.

53. The DMV contacted Defendant Abebe by mail, notifying her of each traffic infraction, the associated penalties, and the associated period to resolve each infraction. Overall, the DMV allotted Defendant 120 days from the date of each Notice of Infraction to contest or resolve any associated fines and penalties.

54. Due to Defendant Abebe's failure to resolve the traffic citations with the DMV, the DMV referred Defendant's unpaid fines and penalties to CCU.

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

56. On October 24, 2024, CCU sent Defendant Abebe a final demand letter notifying her of the unpaid delinquent debt and providing information on how to resolve it. Defendant Abebe failed to resolve the delinquent debt with CCU.

57. Thereafter, CCU referred this matter to the Office of the Attorney General for the District of Columbia to initiate a civil action to collect the debt.

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

58. The District incorporates by reference all allegations stated as previously set forth in paragraphs 1-57.

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

60. The owner of a registered vehicle is liable for payment of any fine and penalties associated with a traffic infraction. D.C. Code § 50-2209.02(a); *see also* D.C. Code § 50-2302.05(e) ("If a person fails to answer the notice within 60 calendar days after the date the notice was issued, . . . the commission of the infraction shall be deemed admitted and all points, penalties, and fines shall be assessed.")

61. At all relevant times, Defendant Abebe was the registered owner of Virginia vehicle license plates **VAUJK1213**, **VAVJB8480**, and **VAU23298**.

62. The District issued 148 speeding citations to Defendant Abebe under license plate number **VAUJK1213**.

63. Defendant Abebe failed to answer and thus is liable for all fines, penalties, and fees for these speeding infractions.

64. As of the filing date, Defendant Abebe owes the District \$46,320 for 148 delinquent speeding citations out of the total \$51,672 debt under license plate number **VAUJK1213**.

65. The District issued citations for 11 speeding infractions to Defendant Abebe under license plate number **VAVJB8480**.

66. Defendant Abebe failed to answer and was thus deemed liable for all fines, penalties, and fees for these speeding infractions.

67. As of the filing date, Defendant Abebe owes the District \$3,000 for 11 delinquent speeding infractions out of the total \$4,056 debt under license plate number **VAVJB8480**.

68. The District issued citations for four speeding infractions to Defendant Abebe under license plate number **VAU23298**.

69. Defendant Abebe failed to answer and was deemed liable for all fines, penalties, and fees for these speeding infractions.

70. As of the filing date, Defendant Abebe owes the District the entire \$1,200 for all four delinquent speeding infractions under license plate number **VAU23298**.

71. In total, Defendant Abebe has 163 delinquent speeding citations and owes the District \$50,520 in outstanding debt for failure to answer or otherwise pay the associated fines, penalties, and fees with her registered Virginia license plates.

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

72. The District incorporates by reference all allegations previously set forth in paragraphs 1-71.

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

74. CCU has referred to the Office of the Attorney General Defendant Abebe's delinquent debt arising from her nonpayment of 197 delinquent traffic citations.

75. As of the filing date, Defendant Abebe owes the District \$1,680 for traffic citations issued under driver's license **VAB69617101**.

76. As of the filing date, Defendant Abebe owes the District \$51,672 for traffic citations issued under driver's license **VAUJK1213**.

77. As of the filing date, Defendant Abebe owes the District \$4,056 for traffic citations issued under license plate **VAVJB8480**.

78. As of the filing date, Defendant Abebe owes the District \$1,200 for the traffic citation issued under license plate **VAU23298**.

79. As Defendant Abebe has failed to answer the traffic citations associated with her Virginia driver's license and registered Virginia license plates with the DMV noted above, Defendant Abebe owes the assessed fines, penalties, and fees to the District. The District now seeks \$58,608 from Defendant Abebe for all delinquent debt owed to the District arising from Defendant's outstanding traffic citations set forth in this Complaint.

PRAYER FOR RELIEF

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

- (1) Award the District \$58,608 for Defendant Abebe's unpaid fines, penalties and fees;
and
- (2) Award reasonable attorney's fees; and
- (3) Award the District such further and additional relief as the Court may deem just and proper.

Dated: _____

Respectfully submitted,

BRIAN L. SCHWALB
Attorney General for the District of Columbia

CHAD COPELAND
Deputy Attorney General
Civil Litigation Division

/s/ Kimberly M. Johnson _____
KIMBERLY M. JOHNSON [435163]
Chief, Civil Enforcement Section

/s/ Kerslyn D. Featherstone _____
KERSLYN D. FEATHERSTONE [478758]
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Attorneys for the District of Columbia

DISTRICT OF COLUMBIA, ss:

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

SIGNED AND SWORN to before me this _____ day of _____ 2025.

NOTARY PUBLIC, D.C.

My commission expires: _____.