

FILED

JUL 19 2024

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

Superior Court of the
District of Columbia

SHERON JONES,
859 51st Street SE, Washington, DC 20019

Plaintiff,

v.

VINTAGE EQUITY GROUP, LLC
DAYON ARRINGTON,
SUTTONPARK CAPITAL, LLC.

Defendants.

Civil Action **2024 04523**

JURY TRIAL DEMANDED

COMPLAINT

SHERON JONES (“**Plaintiff**” or “**Ms. Jones**”) files this action against Defendants Vintage Equity Group, LLC (“**Vintage**”); Dayon Arrington (“**Mr. Arrington**”), and SuttonPark Capital, LLC (“**SuttonPark**”) (collectively, the “**Defendants**”) for violations of the District of Columbia’s Structured Settlements Protection Act of 2018 (“SSPA”), D.C. Code §§ 28A-101 *et seq.* and the District of Columbia’s Consumer Protection Procedures Act (“CPPA”), D.C. Code §§ 28-3901, *et seq.*, and to seek a declaratory judgment that the transfers of Ms. Jones’s structured settlement payments are void.

JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921.
2. This Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423 because they transact business in the District of Columbia; they caused tortious injury in the District of Columbia by an act or omission in the District of Columbia; or they caused tortious injury in the District of Columbia by an act or omission outside the District of

Columbia and Defendants regularly do or solicit business, engage in any other persistent course of conduct, or derive substantial revenue from services rendered in the District of Columbia.

3. Venue is proper in the District of Columbia because it is where the transactions leading to this action occurred.

PARTIES

4. Plaintiff Sheron Jones (“**Plaintiff**” or “**Ms. Jones**”) is a vulnerable adult who has resided in the District of Columbia at all relevant times.
5. Defendant Vintage Equity Group, LLC (“**Vintage**”) is a Delaware Limited Liability Corporation with its principal place of business at 913 N Market Street, Suite 200, Wilmington, DE 19801. Vintage also maintains an office in Maryland, located at 17 W Jefferson Street, Suite 107, Rockville, MD 20850. Vintage is an annuity buyer that purchases structured settlement and annuity payments for cash. Vintage engages in the offer and sale of goods or services to consumers in the District of Columbia for their personal, household, or family purposes. At all times relevant herein, Vintage was acting by and through its agents, servants, and/or employees, all of whom were acting within the scope of their employment, for and on behalf of Vintage.
6. Defendant Dayon Arrington (“**Mr. Arrington**”) was, at all relevant times, an employee and agent of Vintage.
7. Defendant SuttonPark Capital, LLC (“**SuttonPark**”) is a Delaware Limited Liability Corporation with its principal place of business at 600 Brickell Avenue, 19th Floor, Miami, Florida 33131. SuttonPark is Vintage’s “assignee” in the transfer of Ms. Jones’ structured settlement payments.

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FACTUAL ALLEGATIONS

A. Ms. Jones is Severely Disabled as a Result of Lead Poisoning

8. Over the course of many years of Ms. Jones's childhood, she was poisoned by exposure to hazardous lead paint. As a result of that exposure, Ms. Jones suffered serious, permanent, and irreversible neuropsychological injuries.
9. Due to the lead poisoning, Ms. Jones struggles with severe learning disabilities and other cognitive impairments.
10. A neuropsychological evaluation conducted when Ms. Jones was in middle school found that she had a Full-Scale IQ of 56 (0.2 percentile rank for her age), and that she had "significant limitations in both the verbal/language and nonverbal/visual domains." The evaluation further noted that she demonstrated "very weak skills in all aspects of concept formation, logical analysis, abstract reasoning, and practical reasoning/common-sense judgment." The report concluded that Ms. Jones's "deficits reflect permanent cognitive impairment which will pose life-long challenges for [her]."
11. Ms. Jones had an Individualized Education Plan (IEP) throughout her education.
12. Now in her forties, Ms. Jones can read only at a 3rd grade reading level.
13. Ms. Jones has never driven a car and does not have a driver's license.
14. Ms. Jones has a fifteen-year-old daughter.
15. Ms. Jones's only sources of income at the time of filing this complaint are Supplemental Security Income (SSI) and Temporary Assistance for Needy Families (TANF).
16. Ms. Jones and her daughter live with Ms. Jones's mother, Terry Jones.
17. The Jones family has been living at 859 51st Street Southeast, Washington, DC 20019 since approximately December 2020.

B. Ms. Jones Received a Structured Settlement as a Result of a Personal Injury

Lawsuit

18. In 1997, Ms. Jones and two of her family members settled a personal injury lawsuit that they had filed against multiple landlords related to lead poisoning caused by their exposure to hazardous lead paint.
19. As part of that settlement, Ms. Jones received a sum of money to purchase a guaranteed life contingent annuity, with monthly payments to Ms. Jones commencing on her 19th birthday and increasing 2% annually.
20. In April 1998, when Ms. Jones turned 19, she received her first monthly annuity payment.
21. Since then, Ms. Jones's monthly annuity payment was deposited directly into Ms. Jones's bank account. Ms. Jones originally banked with Bank of America, and at some point switched to FedChoice Federal Credit Union.
22. For most of her adult life, Ms. Jones has relied on these monthly annuity payments as her primary source of income.
23. Due to her disability, Ms. Jones has never held a job for longer than six (6) months. Ms. Jones had two summer jobs while she was in high school. As an adult, Ms. Jones has only been employed twice: she worked at an Ames department store for 3-4 months, and at a movie theater for a week or two.

C. The Businesses of Vintage and SuttonPark

24. Vintage and SuttonPark are in the business of brokering and purchasing structured settlement payment streams at a discount. This business is commonly known as the structured settlement secondary market.

25. All of the periodic payments (the “**Periodic Payments**”) transferred from Ms. Jones to Vintage were assigned to SuttonPark by Vintage.
26. Defendants know that any agreement to sell or transfer structured settlement periodic payments in the District of Columbia requires court approval under D.C. Code Section 28A-101 *et seq.* (the “**DC SSPA**”).
27. Vintage filed two petitions in D.C. Superior Court seeking court approval to purchase Ms. Jones’s Periodic Payments pursuant to the DC SSPA (the “**Petitions**”).
28. The first petition involved an alleged sale of 280 months’ worth of Ms. Jones’s Periodic Payments (April 3, 2028, through May 3, 2048), totaling \$380,257.80, to Vintage for \$63,098.58.
29. The second petition involved an alleged sale of 72 months’ worth of Ms. Jones’s Periodic Payments (April 3, 2022 through March 3, 2028), totaling \$87,662.88, to Vintage for \$50,021.10.
30. The total amount that was to be paid to Ms. Jones based on the two Petitions is \$113,119.68.
31. Both Petitions and all subsequent court filings reflected an outdated address for Ms. Jones. As a result, Ms. Jones did not receive any mailed copies of the court filings related to either Petition.
32. Vintage knew where Ms. Jones actually lived at the time of filing the Petitions but mailed the notices to the wrong address to conceal its actions.
33. Ms. Jones was not represented by counsel at any time during her interactions with Vintage, nor was she represented by counsel in connection with the Petitions filed in D.C. Superior Court.

34. Both Petitions included copies of transfer agreements and disclosure statements that purportedly were e-signed by Ms. Jones. Ms. Jones did not e-sign any of the documents that were filed with the Court in relation to the Petitions.
35. The disclosure statements that Vintage provided to Ms. Jones stated that the payee had the right to cancel the transfer agreement, without penalty or further obligation, “not later than the close of business on the third business day after the date the agreement is signed[.]” Under the DC SSPA, Vintage was required to provide Ms. Jones with a disclosure statement for each transaction that set forth: “That the payee has the right to cancel the transfer agreement, without penalty or further obligation, at any time before entry of a final court order approving the transfer.” *See* D.C. Code § 28A-103(9) (emphasis added).
36. Upon information and belief, Vintage knew that the representations made to D.C. Superior Court in connection with the Petitions were false and misleading in all material respects.
37. Among other things, Vintage made representations to D.C. Superior Court about Ms. Jones’s intention to buy a car. Vintage knew or should have known that Ms. Jones did not have a driver’s license and does not know how to drive, therefore she had no reasonable intention of buying a car.
38. The disclosure statements that were filed with the Petitions list “None” under “transfer expenses,” and each included an estimate that the amount of any such fees and disbursements is “\$0.00.” The transfer order that was issued for the first of the two Petitions stated: “ORDERED that Transferee shall pay Payee the net sum of \$63,098.58 for the Assigned Payments. There shall be no additional fees, deductions, or offsets of

any kind[.]” The transfer order for the second of the two Petitions stated: “ORDERED that Transferee shall pay Payee the net sum of \$50,021.10 for the Assigned Payments. There shall be no additional fees, deductions, or offsets of any kind[.]” However, contrary to those disclosures filed with the Court and in violation of the transfer orders that were issued for each of the Petitions, Vintage deducted transfer expenses and other fees from the net advance amounts that it provided to Ms. Jones in relation to the Petitions.

39. Vintage also coached Ms. Jones in real time whenever she appeared telephonically before the Court regarding the Petitions. Dayon Arrington went to Ms. Jones’s home, sat next to her on the couch, used his cell phone to dial into the hearings, did not disclose to the Court that he was present with Ms. Jones, and used the mute/unmute feature on his phone to secretly instruct Ms. Jones on how to answer the Court’s line of questions aimed at ascertaining whether the transfer would be in Ms. Jones’s best interest. The phone number used to dial into at least one hearing had a “302” area code, indicating that it was a Delaware phone number. Vintage is headquartered in Delaware. Ms. Jones has never had a phone number with a “302” area code.

40. Both Petitions were ultimately approved by the Court, and a transfer order was issued for each transaction.

D. Ms. Jones Did Not Understand that She was Selling her Periodic Payments

41. Ms. Jones received three checks from SuttonPark in the amounts of \$47,548.58, \$9,500, and \$37,771.10, totaling \$94,819.68. Ms. Jones did not understand that these checks were payment for the sale of her Periodic Payments, and she did not take any independent steps to cash or deposit the checks.

42. On or around October 13, 2021, Mr. Arrington picked Ms. Jones up from her home in Washington, D.C. and drove her to a SunTrust bank branch in Maryland. Upon information and belief, Mr. Arrington told branch employees that he was assisting his friend, Ms. Jones, with opening a bank account. A bank employee opened a checking account and a savings account for Ms. Jones. Mr. Arrington then instructed Ms. Jones to deposit \$85,319.68 into the savings account and \$9,500 into the checking account.
43. On or around October 15, 2021, SunTrust sent two emails to Ms. Jones. The first email, received at 11:53am, indicated that her account had been enrolled in SunTrust Digital Banking. The second email, received at 12:51pm, stated that biometric authentication had been activated for her mobile banking account and that her account could now be accessed using Face ID, Touch ID, or Fingerprints instead of a username and password. Ms. Jones does not use online or mobile banking, and she did not sign up for SunTrust Digital Banking or activate biometric authentication on this account.
44. On October 16, 2021, SunTrust sent an email to Ms. Jones at 1:37am stating that she had received an important notice regarding her SunTrust savings account: "Overdraft Coverage Acceptance Confirmation."
45. On October 18, 2021, SunTrust sent two emails to Ms. Jones regarding Mr. Arrington. The first email, received at 10:43am, sought confirmation that Ms. Jones had "added or changed the contact info for Dayon Arrington." The second email, received six minutes later at 10:49am, stated a \$1,000 Zelle transfer from Ms. Jones's SunTrust Bank savings account to Mr. Arrington had finished processing.
46. Ms. Jones either did not see or was unable to comprehend any of the aforementioned emails that she received from SunTrust Bank due to her severe cognitive impairment.

47. Ms. Jones does not know what happened to the remaining money that was deposited into the SunTrust accounts. Upon information and belief, the accounts were closed by SunTrust due to Mr. Arrington's fraudulent activity. Ms. Jones does not have access to the money or records related to these accounts.
48. In April 2022, the first month in which Ms. Jones' structured settlement payments were transferred to Vintage and/or SuttonPark, Ms. Jones expected to receive her payment and was confused when it was not deposited into her credit union account. She called the annuity obligor to ask why she had not received her annuity payment. She was informed that her payments had been transferred.
49. Still confused, Ms. Jones immediately called her mother, Terry Jones, to tell her that the annuity money had not been deposited into her account. Terry Jones had been wholly unaware of Ms. Jones's interactions with Vintage.
50. After Terry Jones returned home from work, she asked Ms. Jones what had happened with the annuity payment. Ms. Jones did not understand what had happened to her Periodic Payments, so she was unable to provide her mother with any explanation. Seeking answers for herself and her mother, Ms. Jones called Mr. Arrington and spoke to him on speakerphone while her mother was in the room. Ms. Jones asked Mr. Arrington what had happened to her annuity payments, and he told her to stop harassing him.
51. In the following days, Ms. Jones and Terry Jones attempted to call Mr. Arrington together to ask him what happened to Ms. Jones's money, but they were unable to reach him. When they called Vintage and asked to speak to Mr. Arrington, Vintage told them he was unavailable.

52. A few days later, Ms. Jones and her mother finally reached Mr. Arrington. Ms. Jones again asked him what had happened to her annuity payments and he told her that she already knew what had happened. Terry Jones said to Mr. Arrington that Ms. Jones didn't have her money, and Mr. Arrington responded that she needed to ask Ms. Jones about it. Mr. Arrington also threatened Ms. Jones by saying that he would call the police and have her put in jail if she did not stop harassing him about her money.
53. In or around June 2022, Ms. Jones suddenly received, by mail, copies of some of the court records relating to the Petitions. Unable to comprehend the records herself and afraid that they would upset her mother, Ms. Jones hid them in her bedroom drawer and did not discuss them with Terry Jones.
54. On or around September 22, 2022, Ms. Jones went to D.C. Superior Court to drop off a letter addressed "To Whom It May Concern." The letter stated that Ms. Jones had received only \$7,000 and had not been paid the first payment of \$50,021.10 or the second payment of \$63,098.58. It further stated that Ms. Jones had been calling Vintage, which had not returned any of her phone calls. A D.C. Superior Court clerk of court provided Ms. Jones with a case number of the case involving the second of the two Petitions filed by Vintage, as well as the name of the judge who had handled the case. Ms. Jones wrote the information provided by the clerk onto a plain piece of paper and included it with the letter as a cover page. Ms. Jones also included a copy of all of the documents that she had received in the mail in June 2022.
55. Ms. Jones then returned the court record copies that she had received in June 2022 to her bedroom drawer and waited for the Court to respond to her letter.
56. Ms. Jones did not receive a response to her letter.

57. In or around December 2022, Terry Jones went to Ms. Jones's bedroom drawer to look for something and discovered the court records hidden in the drawer.

COUNT I: Violation of the District of Columbia's Structured Settlements Protection

Act of 2018 ("SSPA"), D.C. Code §§ 28A-101 et seq.

(Against Vintage and SuttonPark)

58. Plaintiff incorporates by reference the preceding paragraphs as fully set forth herein.

59. Under the DC SSPA, Vintage was required to provide Ms. Jones with a disclosure statement for each transaction that set forth: "That the payee has the right to cancel the transfer agreement, without penalty or further obligation, at any time before entry of a final court order approving the transfer." See D.C. Code § 28A-103(9) (emphasis added). The disclosure statements that Vintage filed with the Court stated that the payee had the right to cancel the transfer agreement, without penalty or further obligation, "not later than the close of business on the third business day after the date the agreement is signed[.]" In doing so, Vintage acted in *per se* violation of D.C. Code § 28A-103(9).

60. Additionally, Vintage failed to include in its disclosures a true and accurate "itemized listing of all applicable transfer expenses, other than attorney's fees and related disbursements payable in connection with the transferee's application for approval of the transfer, and the transferee's best estimate of the amount of any such fees and disbursements," in violation of D.C. Code § 28A-103.

61. Moreover, Vintage did not in fact provide timely disclosures to Ms. Jones, in violation of D.C. Code § 28A-103. Ms. Jones was not provided with a copy of the disclosures until she received emailed copies which already contained her purported e-signatures (but which she did not actually e-sign).

62. Because Vintage failed to timely provide Ms. Jones with the proper disclosures required by D.C. Code § 28A-103, the transfers of Ms. Jones's Periodic Payments were not legally effective and the structured settlement obligor or annuity issuer is not required to make any payment directly to any transferee (Vintage) or assignee (SuttonPark) of any payment rights. *See* D.C. Code § 28A-105(a).
63. Additionally, Vintage misinformed the Court that Ms. Jones intended to purchase a vehicle with the proceeds and instructed Ms. Jones on what to say during the hearings without the Court's knowledge. These actions prevented the Court from making an informed decision as to whether the transfer "is in the best interest of the payee, considering the welfare and support of the payee's dependents," as required by D.C. Code § 28A-105(b).
64. As a result, the Court should declare the prior transfers void so that Ms. Jones can receive her annuity payments going forward, order SuttonPark to pay Ms. Jones the amount of the prior annuity payments it has received, and order Mr. Arrington to pay SuttonPark for any of the transfer payment money that he has obtained.

COUNT II: Violation of the D.C. Consumer Protections and Procedures Act

(Against Vintage)

65. Plaintiff incorporates by reference the preceding paragraphs as fully set forth herein.
66. The CPPA prohibits unfair and deceptive trade practices in connection with the offer, sale, and supply of consumer goods and services, and establishes an enforceable right to truthful information from merchants about consumer goods and services that are or would be purchased, leased, or received in the District of Columbia.

67. Defendant Vintage is a “person” and “merchant” that provides “goods and services” within the meaning of the CPPA. *See* D.C. Code § 28-3901(a)(1), (3), (7).

68. Ms. Jones sold her Periodic Payments to Vintage and is a “consumer” under the CPPA.

69. Vintage violated the CPPA by engaging in unfair, misleading, and deceptive trade practices, including but not limited to:

- a. Vintage’s failure to disclose, or failure to adequately disclose, to Plaintiff that she had the right to cancel the transfer agreements, without penalty or further obligation, at any time before the entry of a final court order approving the transfer is a material fact, the omission of which tended to mislead Plaintiff and is an unfair and deceptive trade practice that violates the CPPA, D.C. Code § 28-3904(f).
- b. Upon information and belief, Vintage intentionally provided Ms. Jones’s former address to the Court so that she would not see the court filings, constituting an omission of a material fact that tends to mislead and is an unfair and deceptive trade practice that violates the CPPA, D.C. Code § 28-3904(f).
- c. Vintage represented that their transaction with Plaintiff involved obligations which it did not have or involve, or which are prohibited by law, when it deducted, without making proper disclosures under the DC SSPA and in violation of the transfer orders issued by this Court, additional fees and expenses from the amounts that it paid Ms. Jones which is an unfair and deceptive trade practice that violates the CPPA, D.C. Code § 28-3904(e-1).

- d. Vintage e-signed the contracts for Ms. Jones and then presented those signatures to the Court as if they were signed by Ms. Jones, which is an unfair and deceptive trade practice that violates the CPPA, D.C. Code § 28-3904.
- e. Vintage misinformed the Court that Ms. Jones intended to purchase a vehicle with the proceeds and instructed Ms. Jones on what to say during the hearings without the Court's knowledge, which is an unfair and deceptive trade practice that violates the CPPA, D.C. Code § 28-3904.

70. As a result, Plaintiff is entitled to all forms of relief provided under D.C. Code § 28-3905(k)(2).

COUNT III: The Contracts are Unenforceable and Should Be Declared Void Because of

Undue Influence

(Against Vintage and SuttonPark)

- 71. Plaintiff incorporates by reference the preceding paragraphs as fully set forth herein.
- 72. Ms. Jones is a vulnerable adult who is especially susceptible to persuasion by others due to her severe cognitive impairment.
- 73. Ms. Jones was unduly influenced by Vintage through its agent Mr. Arrington to participate in the processes that Vintage set in motion to transfer her Periodic Payments to Vintage to then be assigned to SuttonPark.
- 74. The sales of Ms. Jones's Periodic Payments to Vintage were against her best interest.
- 75. The contracts between Vintage and Ms. Jones should be declared void.

COUNT IV: Conversion

(Against Mr. Arrington and Vintage)

76. Plaintiff incorporates by reference the preceding paragraphs as fully set forth herein.
77. Defendants Mr. Arrington and Vintage unlawfully gained control over Ms. Jones's SunTrust mobile banking account and fraudulently transferred \$1,000 of Ms. Jones's money to Mr. Arrington.
78. The conduct of Mr. Arrington and Vintage demonstrates that they engaged in an unlawful exercise of ownership, dominion, and control over the personal property of Ms. Jones in denial or repudiation of Ms. Jones's rights thereto.
79. In doing so, Mr. Arrington and Vintage converted Ms. Jones's property.
80. SunTrust Bank closed Ms. Jones's accounts due to Mr. Arrington's fraudulent activity.
81. Ms. Jones does not know if Mr. Arrington transferred the rest of the money to himself before the account was closed.
82. Despite her repeated attempts to get Vintage's and Mr. Arrington's help with locating her missing money, Ms. Jones has been unable to recover the money she was paid pursuant to the Court's orders.
83. As a result, Ms. Jones has been injured and has lost \$94,819.68 plus interest from the date of the theft.
84. In equity, Ms. Jones seeks \$94,819.68, plus fees and costs from Defendants.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully prays this Court for the following relief on a joint and several basis:

- 1) Declare that Defendants' actions, as described herein, violated the SSPA, D.C. Code §§ 28A-101 et seq;

- 2) Declare that Defendants' actions, as described herein, violated the CPPA, D.C. Code § 28-3904 (f) & (e-1);
- 3) Declare that the transfers of Ms. Jones's Periodic Payments are void as a matter of law and public policy;
- 4) Declare that Defendants' actions, as described herein, constituted conversion;
- 5) Order equitable relief, including rescission of the transfer agreements, restitution, and disgorgement of any of Defendants' ill-gotten gains and the proceeds of such, and award those amounts to Plaintiff;
- 6) Award Plaintiff damages, including:
 - a. The greater of (a) treble damages, or (b) statutory damages in the amount of \$1,500 per violation of the CPPA, pursuant to D.C. Code § 28-3904(k)(2)(A);
 - b. Additional relief as may be necessary to restore Plaintiff's money, which was acquired by means of Defendants' unlawful trade practices under the CPPA, pursuant to D.C. Code § 28-3905(k)(2)(E);
 - c. Punitive damages in an amount determined at trial, pursuant to D.C. Code § 28-3905(k)(2)(C); and
 - d. Compensatory damages, pursuant to D.C. common law, for Defendants' conversion.
- 7) Award Plaintiff reasonable attorney's fees and costs, including but not limited to pursuant to D.C. Code § 28-3905(k)(2)(B);
- 8) Award Plaintiff pre- and post-judgment interest to the extent allowable; and
- 9) Award such other relief which the court determines proper, including but not limited to pursuant to D.C. Code §§ 28-3905(k)(2)(F) and 28A-101 et seq.

JURY DEMAND

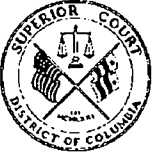
Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: July 19, 2024

Respectfully Submitted,

Courtney Wilkes

Courtney Wilkes, Esq. (Bar No: 1619298)
Tzedek DC | Staff Attorney
c/o UDC David A. Clarke School of Law
4340 Connecticut Ave NW, Suite 319
Washington, DC 20008
(202) 888-4511
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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

Sheron Jones

Plaintiff

vs.

Case Number 2024 04523

Vintage Equity Group, LLC

Defendant

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.

Courtney Wilkes (DC Bar No. 1619298)

Name of Plaintiff's Attorney

4340 Connecticut Ave NW, Suite 319

Address

Washington, DC 20008

202-888-4511

Telephone

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

법석을 신청하면, (202) 879-4828로 전화주세요

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By

[Signature]
 Clerk of the Court
 Deputy Clerk

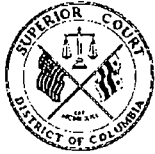
Date

07-19-2024

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
 Veá al dorso la traducción al español



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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

Sheron Jones

Demandante

contra

Número de Caso: _____

Vintage Equity Group, LLC

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.

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Courtney Wilkes (DC Bar.No. 1619298)
 Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

4340 Connecticut Ave NW, Suite 319
 Dirección
 Washington, DC 20008

Por: _____
 Subsecretario

202-888-4511
 Teléfono

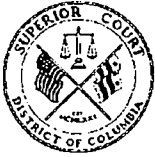
Fecha _____

如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
 반문통역전화 (202) 879-4828 電話翻譯請打 (202) 879-4828 電話翻譯請打 (202) 879-4828 電話翻譯請打 (202) 879-4828

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 pedir ayuda al respecto.

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



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

Sheron Jones

Plaintiff

vs.

Case Number 2024 04523

SuttonPark Capital, LLC

Defendant

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.

Courtney Wilkes (DC Bar No. 1619298)

Name of Plaintiff's Attorney

4340 Connecticut Ave NW, Suite 319

Address

Washington, DC 20008

202-888-4511

Telephone

如需翻译, 请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction.

Đề có một bản dịch, hãy gọi (202) 879-4828

법석을 원하사면, (202) 879-4828로 전화주세요

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

By

M. Watson

Deputy Clerk

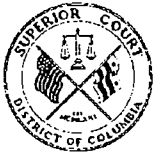
Date

7-19-2024

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
 Veá 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**

Sheron Jones

Demandante

contra

Número de Caso: _____

SuttonPark Capital, LLC

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.

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Courtney Wilkes (DC Bar No. 1619298)
Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

4340 Connecticut Ave NW, Suite 319
Dirección
Washington, DC 20008

Por: _____
Subsecretario

202-888-4511
Teléfono

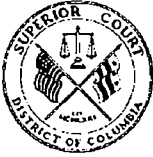
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Vea al dorso el original en inglés
See reverse side for English original



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

Sheron Jones

Plaintiff

vs.

Case Number 2024 04523

Dayon Arrington

Defendant

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.

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Courtney Wilkes (DC Bar No. 1619298)

Name of Plaintiff's Attorney

4340 Connecticut Ave NW, Suite 319

Address

Washington, DC 20008

202-888-4511

Telephone

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Veillez appeler au (202) 879-4828 pour une traduction

Đề có một bài dịch, hãy gọi (202) 879-4828

법역을 입학사정관, (202) 879-4828로 전화하십시오. የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

By

M. W. A. LEON
Deputy Clerk

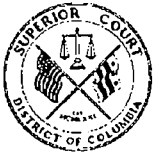
Date

07-19-2024

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Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Sheron Jones

Demandante

contra

Número de Caso: _____

Dayon Arrington

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Courtney Wilkes (DC Bar No. 1619298)

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

4340 Connecticut Ave NW, Suite 319

Por: _____

Dirección

Subsecretario

Washington, DC 20008

202-888-4511

Fecha _____

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반영을 위해 전화 (202) 879-4828

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH INFORMATION SHEET

Sheron Jones
Plaintiff(s)
vs
Vintage Equity Group, LLC, et al.
Defendant(s)

Case Number: 2024 04523
Date: _____

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

| | |
|---|---|
| Name: (Please Print) Courtney Wilkes | Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____ |
| Firm Name: Tzedek DC | |
| Telephone No.: (202) 888-4511 DC Bar No.: 1619298 | |

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$284,459.04 (at least) plus attorney's fees Other: Contract rescission; declaratory judgment

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

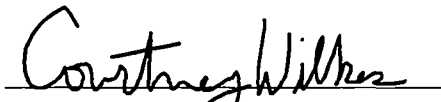
Case No.: _____ Judge: _____ Calendar #: _____

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

| | | |
|--|---|---|
| NATURE OF SUIT: (Check One Box Only) | | |
| CONTRACT <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Breach of Warranty <input type="checkbox"/> Condo/Homeowner Assn. Fees <input type="checkbox"/> Contract Enforcement <input type="checkbox"/> Negotiable Instrument | COLLECTION/INS. SUB <input type="checkbox"/> Debt Collection <input type="checkbox"/> Insurance Subrogation <input type="checkbox"/> Motion/Application for Judgment by Confession <input type="checkbox"/> Motion/Application Regarding Arbitration Award | EMPLOYMENT DISPUTE <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Discrimination <input type="checkbox"/> Wage Claim <input type="checkbox"/> Whistle Blower <input type="checkbox"/> Wrongful Termination |
| REAL PROPERTY <input type="checkbox"/> Condo/Homeowner Assn. Foreclosure <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Drug Related Nuisance Abatement | <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Interpleader | <input type="checkbox"/> Other <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance |
| ADMINISTRATIVE PROCEEDINGS <input type="checkbox"/> Administrative Search Warrant <input type="checkbox"/> App. for Entry of Jgt. Defaulted Compensation Benefits <input type="checkbox"/> Enter Administrative Order as Judgment <input type="checkbox"/> Libel of Information <input type="checkbox"/> Master Meter <input type="checkbox"/> Petition Other | <input type="checkbox"/> Release Mechanics Lien <input type="checkbox"/> Request for Subpoena MALPRACTICE <input type="checkbox"/> Medical - Other <input type="checkbox"/> Wrongful Death | <input type="checkbox"/> FRIENDLY SUIT <input type="checkbox"/> HOUSING CODE REGULATIONS <input type="checkbox"/> QUI TAM <input type="checkbox"/> STRUCTURED SETTLEMENTS AGENCY APPEAL <input type="checkbox"/> Dangerous Animal Determination <input type="checkbox"/> DCPS Residency Appeal <input type="checkbox"/> Merit Personnel Act (OEA) <input type="checkbox"/> Merit Personnel Act (OHR) <input type="checkbox"/> Other Agency Appeal |
| <input type="checkbox"/> APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT | | |

Information Sheet, Continued

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


 Filer/Attorney's Signature

July 19, 2024

 Date