

In The Circuit Court of Montgomery County, Maryland

Mithun Banerjee 13119 Fernedge Road, Silver Spring, MD-20906	* *	
Plaintiff(s),	* *	
v.	*	
		* Case Number: C-15-CV-25-005578
		* Requesting for Jury Trial
1) MATTHEW(Matt) LOSAK(Staff), APT. 316, 1001 SPRING ST. SILVER SPRING MD 20910	*	* Claim Amount-\$870,170+Punitive Damages
2) MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED APT. 316, 1001 SPRING ST. SILVER SPRING MD 20910	*	
3) William J. Roberts, ESQ., Montgomery County Democratic Central Committee Member(D15) APT. 316, 1001 SPRING ST. SILVER SPRING MD 20910		
4) Chris Perry, APT. 316, 1001 SPRING ST. SILVER SPRING MD 20910		
5) Josh Fischer Montgomery County Employee Office of the County Attorney 101 Monroe Street, Third Floor Rockville, Maryland 20850		
6) Vaughn M. Stewart 111, ESQ., Maryland State Delegate, District-19(Democrat) Lowe House Office Building, Room 151, 6 Bladen St., Annapolis, MD 21401		
7) Sofia Bushen Silver Spring Citizens Advisory Board, Co-Chair, Commercial Economic Development Committee 816 Easley ST Apt 1631 Silver Spring, Maryland 20910		
8) Omar Lazo 2420 Blueridge Ave, Wheaton, MD 20902		
9) Yvette Monroe Former Gaithersburg City Council Member, 8 Melvin Street #4021,		

Gaithersburg, MD 20877

10) David Mullins(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

11) Emilee Towey(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

12) Tim Hoang(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

13) MONTGOMERY COMMUNITY TELEVISION, INC.
7548 STANDISH PLACE
ROCKVILLE MD 20855

14) NANNETTE O HOBSON
7548 STANDISH PLACE
ROCKVILLE MD 20855

15) MONTGOMERY COMMUNITY MEDIA
7548 STANDISH PLACE
ROCKVILLE MD 20855

16) JASMINE WHITE
7548 STANDISH PLACE
ROCKVILLE MD 20855

Defendants.

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CIVIL TORT COMPLAINT, ECONOMIC, MENTAL AND NON ECONOMIC
DAMAGES AGAINST DEFENDANTS FOR POSSIBLE CORRUPTION, POSSIBLE
INVOLVED IN ACTIVE ELECTION CAMPAIGN IN BAD FAITH BY PROMOTING
THREE CANDIDATES AGAINST PLAINTIFF BEING 501.C.3.ORGANIZATION
INTENTIONALLY & WILLFULLY, POSSIBLE RACISIM & POSSIBLE
DISCRIMINATION AGAINST PLAINTIFF BECAUSE PLAINTIFF IS A LANDORD,
MINORITY, PERSON OF COLOR, ASIAN AMERICAN & IMMIGRANT

A self-represented party's complaint must be construed liberally, Erickson v. Pardus, 551 US. 89, 94(2007). Plaintiff is not an Attorney & request consideration from the Honorable Judge.

- 1) Comes now, the Complainant(s) Mithun Banerjee, a Candidate Running for County Executive for Montgomery County, Maryland, filing a Civil Complaint against the Defendants, mention as ("Defendants") for \$870,170 with Punitive Damages for 1) Possible Corruption, 2) Possible Election Interference willfully & intentionally being 501.C.3 Organization to work against Plaintiff, 3) Received Funds from Montgomery County, Maryland & Promote only Three County Council Member Candidates Running

for County Executive Race 4) Possible Harassment, 5) Committed Possibly Racism, 6) Committed Possibly Discrimination.

- 2) The Defendant includes two Companies & no Military Verification is needed for them & other Defendants are not known to Plaintiff to be in Active Military Service. Plaintiffs request for Punitive Damages, Court Costs & Attorney Fees(If Any).
- 3) Plaintiff received very bad service from WIC & Ms. Julie Dost & Plaintiff filed Complaint against WIC & Ms. Julie Dost multiple times before the incident that happened on 08/31/2022. No investigation ever happened after submitting several complaints of bad services received from WIC & Ms. Julie Dost.
- 4) Plaintiff Mithun Banerjee is an Active Candidate Running for County Executive of Montgomery County, Maryland & is Running a Public Finance Campaign.
- 5) MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & MONTGOMERY COMMUNITY MEDIA, both Organizations are 501.C.3 Organizations & they planned on July 24th, 2025 or before to Host a County Executive Forum on October 8th, 2025.
- 6) As both Organizations involved are 501.C.3, they must not got involved in following Prohibited Activities mentioned below but unfortunately, they did willfully & intentionally.

Prohibited activities

To maintain tax-exempt status, a 501(c)(3) must avoid certain activities:

- **Political campaigns:** Organizations cannot participate in political campaigns for or against candidates. This includes contributions or statements of support/opposition, though nonpartisan activities like voter registration are usually allowed.
- **Lobbying:** While limited lobbying is permitted for public charities, it cannot be a "substantial part" of their activities. Electing the Section 501(h) expenditure test can provide a clearer spending limit. Private foundations face stricter prohibitions on lobbying.

- 7) Mr. Matthew(Matt) Losak sent an email on behalf of MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED invitation to County Council Candidate Mr. Andrew Friedson on July 24th, 2025 who is a Candidate for County Executive for Montgomery County, Maryland but failed to invite me. Please find the invitation attached as **Exhibit-A** which talks about promoting the forum which will have only three

Candidates out of five Candidates running for County Executive for Montgomery County, Maryland,

- 8) I am certain that Mr. Matthew(Matt) Losak sent an email invitation to other two County Council Candidates Mr. Willam Jawando & Mr. Evan Glass, who are also running for County Executive for Montgomery County, Maryland because email blasts were sent on behalf of MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED with their picture on September 25th, 2025.
- 9) Mr. Matthew(Matt) Losak sent an email on behalf of MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED to Plaintiff on October 4th, 2025 at 11:35am EST, for the very first time with a vague qualification requirement for Public Finance Campaign which states the following,

“Greetings, County Executive Candidates. In order to be eligible for the Renters Alliance candidates forum on Wednesday, candidates will need to demonstrate that they have achieved public financing status and/or \$250,000 in campaign donations. If you have achieved either of these requirements, please let me know.”

Based on the requirements above, Plaintiff doesn't get disqualified for attending the County Executive Forum hosted by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED on October 8th, 2025, as per the Opinion of the Plaintiff which was supported by Mr. Allen Norfeet, Director of Candidacy and Campaign Finance, Maryland State Board of Elections.

- 10) Plaintiff sent multiple emails to clarify the Rules for Qualification for the County Executive Forum Hosted by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & MONTGOMERY COMMUNITY MEDIA on October 8th, 2025 but failed to get any resolution & answers. Please find the email attached as **Exhibit-B.**
- 11) Plaintiff sent multiple emails & provided opportunity to MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & MONTGOMERY COMMUNITY MEDIA to correct their mistakes & follow the Guidelines of 501.C.3 Organization's Guidelines but failed to get any corrective actions. Even on October 8th, 2025, MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED sent an email blast for the County Executive Forum scheduled for October 8th, 2025 & removing Plaintiff from the County Executive Forum. Please find the email blast attached as **Exhibit-C.**
- 12) Please find the Certification Letter issued by Mr. Allen Norfeet, Director of Candidacy and Campaign Finance, Maryland State Board of Elections for Mr. Evan Glass dated September 30th, 2025 as **Exhibit-D.**

- 13) Please find the email blast as **Exhibit-E**, sent by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED dated September 25th, 2025 including Mr. Evan Glass as a Candidate to Participate in the County Executive Forum hosted by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & MONTGOMERY COMMUNITY MEDIA on October 8th, 2025 when Mr. Evan Glass was not Certified to receive Public Funds because Mr. Evan Glass got Certified on September 30th, 2025 as per the Certificate Letter attached as **Exhibit-D**.
- 14) MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & Mr. Matthew(Matt) Losak didn't sent any email to the other Candidate Ms. Celeste C. Iroha on July 24th, 2025 & first email she received was on October 4th, 2025, which proves the violations made by Mr. Matthew(Matt) Losak & MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED as per the Rules & Guidelines of 501.C.3 Organization. Please find the email attached as **Exhibit-F**.
- 15) Moreover, several Board Members of MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED are very Powerful & influential people & some are State Delegate, Multiple Attorneys, & Montgomery County Employee & getting involved in 501.C.3 Board & then influence the Active Election process of County Executive of Montgomery County, Maryland is unlawful, illegal, immoral & unethical to my personal opinion & hence, Plaintiff seeks help from this Court for Justice & relief. Please find the names of the Board Members & Staffs details as follows,
- 1) MATTHEW(Matt) LOSAK(Staff),
MONTGOMERY COUNTY RENTERS
ALLIANCE, INCORPORATED
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
 - 2) MONTGOMERY COUNTY RENTERS
ALLIANCE, INCORPORATED
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
 - 3) William J. Roberts, ESQ.
Montgomery County Democratic Central
Committee Member(D15)
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
 - 4) Chris Perry,
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
 - 5) Josh Fischer
Montgomery County Employee
Office of the County Attorney
101 Monroe Street, Third Floor
Rockville, Maryland 20850
 - 6) Vaughn M. Stewart 111, ESQ

Maryland State Delegate, District-19(Democrat)
 Lowe House Office Building, Room 151,
 6 Bladen St., Annapolis, MD 21401
 7) Sofia Bushen
 Silver Spring Citizens Advisory Board,
 Co-Chair,Commercial Economic Development Committee
 816 Easley ST Apt 1631
 Silver Spring, Maryland 20910
 8) Omar Lazo
 2420 Blueridge Ave,
 Wheaton, MD 20902
 9) Yvette Monroe
 Former Gaithersburg City Council Member,
 8 Melvin Street #4021,
 Gaithersburg, MD 20877
 10) David Mullins(Staff),
 APT. 316, 1001 SPRING ST.
 SILVER SPRING MD 20910
 11) Emilee Towey(Staff),,
 APT. 316, 1001 SPRING ST.
 SILVER SPRING MD 20910
 12) Tim Hoang(Staff),,
 APT. 316, 1001 SPRING ST.
 SILVER SPRING MD 20910

16) Moreover, several Board Members of MONTGOMERY COMMUNITY MEDIA & MONTGOMERY COMMUNITY TELEVISION, INC., are very Powerful & influential people & their names are as follows,

13) MONTGOMERY COMMUNITY TELEVISION, INC.
 7548 STANDISH PLACE
 ROCKVILLE MD 20855
 14) NANNETTE O HOBSON
 7548 STANDISH PLACE
 ROCKVILLE MD 20855
 15) MONTGOMERY COMMUNITY MEDIA
 7548 STANDISH PLACE
 ROCKVILLE MD 20855
 16) JASMINE WHITE
 7548 STANDISH PLACE
 ROCKVILLE MD 20855

17) Montgomery County Renters Alliance, Inc. previously sent an email blast dated September 25th, 2025 where no qualifying criteria to County Executive Forum was mentioned & Mr. Evan Glass name & picture was attached. Mr. Evan

Glass got Certified by Maryland State Board of Election on September 30th, 2025. So, on October 4th, 2025 & October 8th, 2025 email blasts from Montgomery County Renters Alliance, Inc. included a vague requirements to stop Plaintiff to attend the County Executive Forum in possibly Conspiracy & unlawful Manners. Please find the **Exhibit-G** which is the email blast dated October 4th, 2025 & please find the **Exhibit-H** which is the email blast dated October 8th, 2025.

- 18) Plaintiff sent the Court Filings to Defendants on October 8th, 2025 at 4:57pm EST by email & informed Mr. Matthew(Matt) Losak by Text Message at 5:01pm EST but the Defendants choose to violate the Election Interference Laws & IRS Rules & Guidelines of 501.C.3 by willful & intentional violations of Laws to promote 3 Establishment Candidates who are currently the County Council Members Mr. William(Will) Jawando, Mr. Evan Glass & Mr. Andrew Friedson against the Candidacy of the Plaintiff. Please find the documents attached as **Exhibit-I** which shows the email blasts sent by Montgomery County Renters Alliance, Inc. dated October 9th, 2025 promoting Establishment Candidates & removing the Plaintiff.
- 19) Please find the documents attached as **Exhibit-J** which shows the news article by Montgomery Community Media dated October 9th, 2025 promoting Establishment Candidates & removing the Plaintiff.. Defendant choose to violate the Election Interference Laws & IRS Rules & Guidelines of 501.C.3 by willful & intentional violations of Laws to promote 3 Establishment Candidates who are currently the County Council Members Mr. William(Will) Jawando, Mr. Evan Glass & Mr. Andrew Friedson against the Candidacy of the Plaintiff.
- 20) Please find the **Exhibit-K** showing the Profile of Powerful Chief Deputy Majority Whip Mr. Vaughn M. Stewart 111, ESQ., Maryland State Delegate & Lawmaker in the State of Maryland & also an Attorney. He is very close to the Governor of the State of Maryland who attended his Birthday on November 20th, 2024 & the House Speaker of the State of Maryland.
- 21) Please find the **Exhibit-L** showing the webpage of Montgomery County Democratic Central Committee & **Exhibit-M** showing the Facebook page of Powerful Mr. William J. Roberts, Esq. is the Chair & Board Member of Montgomery County Rentals Alliance, Inc. & an Attorney as per his Facebook page & Montgomery County Democratic Party Central Committee website. A Democratic Party Central Committee Member(D15).
- 22) Please find the **Exhibit-N** showing the News Article about Powerful Ms. Yvette Monroe was a Gaithersburg Council Member & community leader got involved in the County Executive Race as Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS.
- 23) Please find the **Exhibit-O** showing the News Article about Powerful Mr. Mr. Josh Fisher, a Montgomery County Government Employees involvement via 501.C.3. He ran for Gaithersburg City Council in the past. A Montgomery County Government employee and active member of the Montgomery County Government Employees Organization (MCGEO) for the past two decades.
- 24) Please find the **Exhibit-P** showing the Montgomery County Website about Powerful Montgomery County Renters Alliance Inc Board Member Ms. Sofia Bushen is

a Part Time Teacher in Montgomery College. She is also a Board Member to Silver Spring Citizens Advisory Board & Co-Chair, Commercial Economic Development Committee. Commissioner of Montgomery County but involved in Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS.

- 25) Please find the **Exhibit-Q** & **Exhibit-R** showing the News Article about Powerful Board Member of Montgomery County Renters Alliance Inc, Former Montgomery County Council Candidate & President of Latino Democratic Club Mr. Omar Lazo is involved in Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS. Mr. Lazo is holding the following powerful positions,

- A) President of Latino Democratic Club
- B) Up-county Hub, Board Member
- C) Black and Brown Coalition for Educational Equity and Excellence, Member
- D) Montgomery College Board of Trustees
- E) Montgomery County Workforce Development Board
- F) Montgomery County Latino Restaurant Association, President
- G) Committee for Montgomery, Board Member
- H) Los Chorrros Restaurant, Owner
- I) Wheaton & Kensington Chamber of Commerce, 2nd Vice President

Mr. Omar Lazo previously Served on the following,

- A) Wheaton Urban District Advisory Committee,
- B) Wheaton Redevelopment Advisory Committee,
- C) County Executive Marc Elrich Transition Team - Economic Development,
- D) Jewish and Latino Business Alliance - Co-Chair,
- E) Committee for Montgomery, Board &
- F) Fund for Montgomery, Board Member.

- 26) Please find the **Exhibit-S** showing the List of County Executive Candidates by Maryland State Board of Election where Candidates filed their Nomination & Active Candidates Lists Running for County Executive for Montgomery County for 2026 where the name of County Council Member Mr. Andrew Friedson's name is not present but still received an invitation to attend the County Executive Forum hosted by Montgomery County Renters Alliance, Inc., & Montgomery Community Media(MCM). Plaintiff's name is present in the list but failed to get any opportunity in the County Executive Forum hosted on October 8th, 2025 by Montgomery County Renters Alliance, Inc., & Montgomery Community Media(MCM).

- 27) Please find the **Exhibit-T** showing the date of Certification for Mr. Will Jawando as September 8th, 2025 by Maryland State Board of Election.

- 28) Please find the **Exhibit-U** showing the Rules & Guidelines of IRS for 501.C.3 Organizations as stated below which is violated by two 501.C.3 Organizations,

"Under the Internal Revenue Code, all section 501(c)(3) organizations are absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office.

Contributions to political campaign funds or public statements of position(verbal or written) made on behalf of the organization in favor of or in opposition to any candidate for public office clearly violate the prohibition against political campaign activity. Violating this prohibition may result in denial or revocation of tax-exempt status and the imposition of certain excise taxes.”

- 29) Please find the **Exhibit-V** showing the IRS 990 Form for 501.C.3 Organizations found in the IRS Website which shows that Montgomery County Renters Alliance, Inc., is self-declared as 501.C.3 Organization.

Please note that the main expense of this Non-Profit is the Salary for Mr. Matthew(Matt) Losak for \$162,240+\$10,583=\$172,823 from the IRS 990 Form.

Moreover, the Office Expense is \$9268+\$8696+\$572=\$18,536 from the IRS 990 Form but unfortunately, no Office Address was provided by Mr. Matthew(Matt) Losak when he listed his name as Resident Agent in the State of Maryland Website & listed his Apartment Address only. Where is the Office?

Plaintiff really surprised to see that no significant expense happened to support Tenants other than a Salary to Mr. Matthew Losak for \$172,823 as a Non Profit 501.C.3 Organization which is possibly Higher Salary than Lieutenant Governor of Maryland approximately \$165,000 & County Council Members of Montgomery County approximately \$167,000.

Why Montgomery County Maryland paid around \$200,000 to Montgomery County Renters Alliance, Inc., if not Tenants are being benefitted other than Big Salary to Mr. Matthew Losak?

Should Montgomery County should continue to support Montgomery County Renters Alliance, Inc. by Taxpayers Money so that Mr. Matthew Losak can get a Pay of \$172,823?

- 30) Please find the **Exhibit-W** showing the IRS 990 Form for 501.C.3 Organizations found in the IRS Website which shows that Montgomery Community Television also known as Montgomery Community Media(MCM), is self-declared as 501.C.3 Organization.
- 31) Please find the **Exhibit-X** showing the website of Montgomery Community Media(MCM), which shows that Montgomery Community Television also known as Montgomery Community Media(MCM) with their following values.

Our Values

Be **BOLD**: Take risks and be open to new ideas.

Be **FLEXIBLE**: Embrace change.

Be **INCLUSIVE**: Respect all voices.

Act with **INTEGRITY**: Be honest and accountable.

- 32) Please find the **Exhibit-Y** showing the News Article of Montgomery Community Media(MCM) dated September 3rd, 2025, which shows that Montgomery Community Television also known as Montgomery Community Media(MCM) knew that Plaintiff was a Candidate for Montgomery County Executive Race but didn't include the Plaintiff in their Co-Hosted County Executive Forum on October 8th, 2025, willfully by violating IRS 501.C.3 Rules & Guidelines & Possible Election Interference to favor the three Establishment Candidates against Plaintiff's Candidacy.
- 33) Please find the **Exhibit-Z** showing the News Article of Montgomery Community Media(MCM) dated October 2nd, 2025, which shows that Montgomery Community Television also known as Montgomery Community Media(MCM) knew that Plaintiff was a Candidate for Montgomery County Executive Race as per their News Article dated September 3rd, 2025 but didn't include the Plaintiff name as a Candidate when Maryland State Board of Election listed Plaintiff as a County Executive Candidate in their Co-Hosted County Executive Forum on October 8th, 2025, willfully & knowingly by violating IRS 501.C.3 Rules & Guidelines & Possible Election Interference to favor the three Establishment Candidates against Plaintiff's Candidacy.
- 34) **Plaintiff's list the Possible Violations occurred as per Plaintiff's personal opinion & listed below.**

Violation Number 1

On July 24th, 2025, Mr. Matthew(Matt) Losak sent an email to Mr. Andrew Friedson invited him & possibly other two County Council Members to the County Executive Forum when none of the 3 Candidates who are Running for Public Finance Campaign were Certified, including Mr. William(Will) Jawando, Mr. Evan Glass & myself. Mr. Will Jawando was Certified on September 8th, 2025 & Mr. Evan Glass was Certified on September 30th, 2025. Unfortunately, I failed to get the invitation on July 24th, 2025.

Violation Number 2

Mr. Andrew Friedson got the email invitation from Mr. Matthew(Matt) Losak on July 24th, 2025 but the email never mentioned the Qualifying Rules to attend the County Executive Forum & never sent me that email invitation with the Qualifying Rules. The Qualifying Rules were missing from the email invitation sent by Mr. Matthew(Matt) Losak on July 24th, 2025.

Violation Number 3

On September 25th, 2025, Renters Alliance sent an email blasts with the picture & names of the 3 County Council Candidates only(Mr. Will Jawando, Mr. Evan Glass & Mr. Andrew Friedson) but Mr. Evan Glass was not a Certified Candidate until September 30th, 2025. Renters Alliance qualification was just for eyewash to keep Plaintiff, a Landlord, Minority, Person of Color, Asian American & Immigrant out of the County Executive Forum in my personal opinion.

Violation Number 4

Plaintiff sent multiple emails to Montgomery County Renters Alliance, Inc(Renters Alliance) & Montgomery Community Media(MCM) by sharing the Rules & Guidelines of IRS for 501.C.3 Organizations, because both the Organizations mentioned that they are 501.C.3 Organizations & requested for corrective action but both the 501.C.3 Organizations choose to not follow the IRS Guidelines willfully with the full knowledge of their Possible Violation.

Violation Number 5

Plaintiff sent an email with the opinion of the Mr. Allen Norfleet Director of Candidacy & Campaign Finance, Maryland State Board of Election, whom Plaintiff spoke on Record, where Mr. Norfleet stated that the qualification mentioned by Mr. Matt Losak in his very first email, to Plaintiff on October 4th, 2025, is very vagues & it doesn't disqualify Plaintiff. Even after getting Plaintiff's email with the opinion of the Director Mr. Allen Norfleet, Mr. Matt Losak & MCM didn't invite Plaintiff for the County Executive Forum. Director Mr. Allen Norfleet is the Issuing Authority from Maryland State Board of Election, who issues the Certification for Public Finance Campaign but his opinion was totally ignored by the two 501.C.3 Organizations.

Violation Number 6

Montgomery County Renters Alliance, Inc updated the email blasts from dated Sepetember 25th, 2025 to October 4th, 2025 to include the Vague Requirements for qualification after Mr. Evan Glass became a Certified Candidate on September 30th, 2025 by Maryland State Board of Election. The Vague Requirement was not present when Montgomery County Renters Alliance, Inc sent the email to Mr. Andrew Friedson on July 24th, 2025 & their email blast dated September 25th, 2025 where the Plaintiff was not included.

Violation Number 7

Council Member Mr. Andrew Friedson was invited to the County Executive Forum but he is not an Official Candidate as per the Maryland State Board of Election. Hence, calling & qualifying a Candidate not filed his Official Paperwork with the Maryland State Board of Election is acceptable by Rental Alliance & MCM but Plaintiff, who is an Active Candidate as per Maryland State Board of Election is not invited.

Violation 8

Maryland State Delegate Mr. Vaughn Stewart, Esq. & Chief Deputy Majority Whip, 2023 is a Board Member of Montgomery County Renters Alliance, Inc & also an Attorney

got involved in a Election as a Board Member of Renters Alliance by deciding to invite & give Platform to 3 Establishment Candidates via 501.C3 Organization & not include Plaintiff & knowing that it's against the IRS Guidelines & Rules because Plaintiff emailed Mr. Matthew(Matt) Losak the Guidelines few days back & requested for a corrective action but failed to see any corrective action. This means that a Maryland State Lawmaker knowingly violated a very wellknown & well published Guidelines of 501.C.3 & ignored Plaintiff's Lawful Email Notice for any Corrective Action. Mr. Vaughn Stewart is a very powerful Lawmaker from the State of Maryland where Governor Mr. West Moore attended his Birthday Celebration on November 20th, 2024(From Facebook).



JOIN DELEGATE VAUGHN STEWART FOR A

BIRTHDAY CELEBRATION

**with a Special Appearance by
Governor Wes Moore
and Special Guests
Senator Ben Kramer
& Chairman Marc Korman**

Wednesday, November 20, 2024
5:00-6:30 PM

The Creek Lodge Bar & Grill
5566 Norbeck Rd, Rockville, MD

For more info and to RSVP:
bit.ly/StewartNov20
(case sensitive)


**Vaughn
Stewart**
Democrat for Delegate

Authority: Friends of Vaughn Stewart, Alexandra Stewart, Treasurer

"Maryland State House Speaker Adrienne A. Jones appointed Mr. Stewart to lead the newly created "Progressive Policy Forum" within the House Democratic Caucus. In 2023,

Ms. Jones appointed Mr. Stewart as one of two Chief Majority Whips for the Maryland House of Delegates(From Wikipedia).

Additional investigations are needed to see if Mr. Vaughn Stewart acted alone or worked as a team or under the direction of others?..... Plaintiff doesn't know this but a Discovery will share lights on these questions if the Circuit Court Admin Judge allows this Case to proceed or may Stay the Case, as Plaintiff suspect. If this Case is Stayed, Plaintiff will file a similar Lawsuit in US Federal District Court of Maryland to see the outcome of the Federal Judiciary.

Plaintiff is curious to know if Mr. Vaughn Stewart is currently a qualified Lawmaker to run again under Maryland Ethics Rules & Elecetion Rules where knowingly he violated IRS Rules & Guidelines & favor 3 establishment County Council Candidates Mr. Will Jawando, Mr. Evan Glass & Mr. Andrew Friedson via 501.C.3 Organization? Plaintiff is searching for answers.

Violation 9

Democratic Party Central Committee Member(D15) Mr. William J. Roberts, Esq. is the Chair & Board Member of Montgomery County Rentals Alliance, Inc. & an Attorney as per his Facebook page & Montgomery County Democratic Party Central Committee website. A Democratic Party Central Committee Member(D15) got involved in Montgomery County Executive Race by inviting 3 Establishment Candidates who are current County Council Members, Mr. Will Jawando, Mr. Evan Glass & Mr. Andrew Friedson via 501.C.3 Organization which he Chairs as a Board Member & thus violated the 501.C.3 Rules & Guidelines of IRS & interefered in Election to promote 3 Establishment Candidates against Plaintiff.

Democratic Party has a clear Policy as stated to Plaintiff by the Leadership of Democratic Party Montgomery County Central Committee Meetings that Democratic Party doesn't interfere & endorse any Candidate in Democratic Primary then how Democratic Party Central Committee Member(D15) is involved in possible Election Interference via 501.C.3 Organization to favor 3 Establishment Candidates against Plaintiff's Candidacy?

Violation 10

Mr. Vaughn Stewart, Esq. & Mr. William J. Roberts, Esq. these two Attorneys in the Board of Montgomery County Renters Alliance, Inc.

Attorneys are the Judicial Officers of the Court. They must know the IRS Guidelines of 501.C.3 Organization(which I emailed to Mr. Matthew(Matt) Losak for corrective action & to follow the IRS Guidelines & it's submitted as Exhibit in this Lawsuit).

As Attorneys & Board Members of Montgomery County Renters Alliance, Inc., which is a 501.C.3 Organization & according to IRS Rules & Guidelines they can't get involved in Election Interference by promoting & hosting 3 Establishment Candidates after getting a

Lawful Email Notice from Plaintiff for corrective action as per the IRS Rules & Guidelines(which was submitted as Exhibit & sent to Mr. Matthe(Matt) Losak few days before) & they violated the IRS Rules & Guidelines possibly willfully & possibly intentional violation of IRS Rules & Guidelines with the full knowledge of IRS Rules & Guidelines.

Are these two Attorneys eligible to Practice Law as Judicial Officer of the Court by their possible willful & possible intentional violation of IRS Rules & Guidelines with the full knowledge of IRS Rules & Guidelines & are they qualified to keep their Law License after this possibly willfully & possibly intentionally violations under Legal, Ethical & Moral Grounds?

Will their Powerful Connection help them to put this possibly willfully & possibly intentional violation of IRS Rules & Guidelines with the full knowledge of IRS Rules & Guidelines under the Rug?

Violation 11

Mr. Josh Fisher, a Montgomery County Government Employees involvement via 501.C.3. He ran for Gaithersburg City Council in the past. A Montgomery County Government employee and active member of the Montgomery County Government Employees Organization (MCGEO) for the past two decades. Why is Mr. Josh Fisher, a Montgomery County employee got involved in Possible Election Interference via 501.C.3 Organization as a Board Member of Montgomery County Renters Alliance Inc. Did he acted alone or by the direction of other?

Violation 12

Montgomery County Renters Alliance Inc Board Member Ms. Sofia Bushen is a Part Time Teacher in Montgomery College. She is also a Board Member to Silver Spring Citizens Advisory Board & Co-Chair, Commercial Economic Development Committee. Commissioner of Montgomery County but involved in Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS.

Violation 13

Board Member of Montgomery County Renters Alliance Inc, Former Montgomery County Council Candidate & President of Latino Democratic Club Mr. Omar Lazo is involved in Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS.

Omar Lazo is involved in Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS. Mr. Lazo is holding the following powerful positions,

- J) President of Latino Democratic Club
- K) Up-county Hub, Board Member
- L) Black and Brown Coalition for Educational Equity and Excellence, Member

- M) Montgomery College Board of Trustees
- N) Montgomery County Workforce Development Board
- O) Montgomery County Latino Restaurant Association, President
- P) Committee for Montgomery, Board Member
- Q) Los Chorros Restaurant, Owner
- R) Wheaton & Kensington Chamber of Commerce, 2nd Vice President

Mr. Omar Lazo previously Served on the following,

- G) Wheaton Urban District Advisory Committee,
- H) Wheaton Redevelopment Advisory Committee,
- I) County Executive Marc Elrich Transition Team - Economic Development,
- J) Jewish and Latino Business Alliance - Co-Chair,
- K) Committee for Montgomery, Board &
- L) Fund for Montgomery, Board Member.

Violation 14

Board Member of Montgomery County Renters Alliance Inc, Ms. Yvette Monroe was a Gaithersburg Council Member & community leader got involved in the County Executive Race as Possible Election Interference via 501.C.3 Organization, which violates the Rules & Guidelines of IRS.

Violation 15

Montgomery Community Media(MCM) is a 501.C.3 Organization should follow the IRS Rules & Guidelines but knowingly they interfered in Election to support 3 Establishment Candidates against the Plaintiff.

Moreover, MCM knew about Plaintiff running for County Executive position for Montgomery County, Maryland & on a Published Article dated September 3rd, 2025 about Mr. Will Jawando, MCM mentioned the name of the Plaintiff but for the County Executive Forum Co-Hosted by MCM on October 8th, 2025, MCM didn't include the Plaintiff.

Violation 16

From the Article of Montgomery Prospective written by Mr. Adam Pagnucco, MCM CEO Jasmine White made the following statement based on a response to Plaintiff's Lawsuit.

MCM CEO Jasmine White sent me the following statement on Banerjee's lawsuit.

Montgomery Community Media (MCM) is aware of a concern that has been raised regarding our participation as a co-sponsor of the Democratic Primary Candidates Forum on Renters' Rights and Affordable Housing, hosted by the Montgomery County Renters Alliance scheduled for October 8, 2025.

As a 501(c)(3) nonprofit public access media organization, MCM provides facilities, platforms, and technical support so that community organizations can host civic discussions of public interest.

The County Executive Candidates Forum is produced and hosted by the Montgomery County Renters Alliance. MCM does not select the participants or influence the content presented during the forum. Therefore, the views and opinions expressed during the event are solely those of the organizers, moderators, and participants and do not represent the views of MCM or its Board of Directors.

MCM remains committed to facilitating free speech, supporting open access to media, and connecting people through shared information and community dialogue.

MCM Co-Hosted the County Executive Forum as a 501.C.3 Organization with partnership with Montgomery County Renters Alliance, Inc., another 501.C.3 Organization. It's unfortunate that MCM & MCM CEO Jasmine White will make such an irresponsible, unethical, immoral & illegal statement that knowingly MCM Media violated the IRS Guidelines of 501.C.3 Organization & hosted the event in their Studio & state that they were not involved to select Candidates but could have enforce the IRS Rules & Guidelines to select Candidates Running for County Executive to Montgomery County Renters Alliance, Inc but MCM CEO Jasmine White didn't do that knowingly to Possibly Influence the County Executive Race to Promote the 3 Establishment Candidates, who are current County Council Members.

Violation 17

Plaintiff sent an email to MCM Media to outline the 501.C.3 Rules & Guidelines of IRS but MCM never corrected their action & even covered the County Executive Forum with wide Publicity without the name & picture of the Plaintiff, where Plaintiff was not allowed to Participate & thus MCM acted against the Candidacy of Plaintiff knowingly & willfully as a 501.C.3 Organization.

MCM knew that a Lawsuit was filed but totally discard the Rule of Law of IRS 501.C.3 Guidelines to not involved in Political Race & promote three Candidates & work against another Plaintiff's Candidacy to help & promote the three Establishment Candidates to win the County Executive Race.

Violation 18

Plaintiff expected MCM, a 501.C.3 Organization to uphold the Ethical Journalism where they state the following to “Be INCLUSIVE: Respect all voices” as their values but unfortunately failed to provide a voice to Plaintiff & thus willfully & intentionally violated 501.C.3 Rules & Guidelines of IRS by acting against the Candidacy of the Plaintiff, a Minority, Landlord, Person of Color, Asian American & Immigrant.

Our Values

Be **BOLD**: *Take risks and be open to new ideas.*

Be **FLEXIBLE**: *Embrace change.*

Be **INCLUSIVE**: *Respect all voices.*

Act with **INTEGRITY**: *Be honest and accountable.*

Violation 19

It’s very shameful that MCM & MCM CEO Jasmine White promises something in their website to Raise Funds but don’t follow their Values in their Operation after collecting money from the Donrs from the Community.

Plaintiff personally belives that it’s disgraceful, unethical, immoral, illegal & possible Fraud action by the MCM & MCM CEO Jasmine White to collect money from Donor as 501.C.3 Organization & then knowingly get involved in Election Interferences to promote 3 Establishment Candidates & work against Plaintiff’s Candidacy.

Violation 20

It’s very shameful that Montgomery County Renters Alliance, Inc Raise Funds under 501.C.3 Banner but don’t follow IRS 501.C.3 Rules & Guidelines in their Operation after collecting money from the Donrs from the Community.

Plaintiff personally belives that it’s disgraceful, unethical, immoral, illegal & possible Fraud action by the Montgomery County Renters Alliance, Inc & Mr. Matthew(Matt) Losak to collect money from Donor as 501.C.3 Organization & then knowingly get involved

in Election Interferences to promote 3 Establishment Candidates & work against Plaintiff's Candidacy.

35) Hence, Plaintiff demands Justice & accountability for the actions of the Defendants as their action caused 1) Possible Corruption, 2) Possible Election Interference willfully & intentionally being 501.C.3 Organization to work against Plaintiff, 3) Received Funds from Montgomery County, Maryland & Promote only Three County Council Member Candidates Running for County Executive Race 4) Possible Harassment, 5) Committed Possibly Discrimination,

36) Plaintiff requests the Court to held the Defendants Responsible for their Actions & held them responsible their action & requests for a Judgement of \$870,170, the Amount Plaintiff can receive from Public Finance Matching Funds from Montgomery County, Maryland to run his Campaign & the actions of Defendants creates obstacles to reach out to voters attending the County Executive Forum in person & via Media Coverages hosted by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED & MONTGOMERY COMMUNITY MEDIA on October 8th, 2025 & with three times Punitive Damages & Attorney Costs & Court Costs.

Respectfully submitted,


Mithun Banerjee

Dated-10/20/2025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _20th day of October, 2025. I sent a copy of the foregoing request for discovery by Electronic Court System/mailed/U.S. mail, postage prepaid, to the Defendants listed below:

- 1) MATTHEW(Matt) LOSAK
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
- 2) MONTGOMERY COUNTY RENTERS
ALLIANCE, INCORPORATED
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
- 3) William J. Roberts, ESQ.,
Montgomery County Democratic Central
Committee Member(D15)
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910
- 4) Chris Perry,
APT. 316, 1001 SPRING ST.

*

SILVER SPRING MD 20910

5) Josh Fischer

Montgomery County Employee
Office of the County Attorney
101 Monroe Street, Third Floor
Rockville, Maryland 20850

6) Vaughn M. Stewart 111, ESQ.,
Maryland State Delegate, District-19(Democrat)
Lowe House Office Building, Room 151,
6 Bladen St., Annapolis, MD 21401

7) Sofia Bushen

Silver Spring Citizens Advisory Board,
Co-Chair, Commercial Economic Development Committee
816 Easley ST Apt 1631
Silver Spring, Maryland 20910

8) Omar Lazo
2420 Blueridge Ave,
Wheaton, MD 20902

9) Yvette Monroe

Former Gaithersburg City Council Member,
8 Melvin Street #4021,
Gaithersburg, MD 20877

10) David Mullins(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

11) Emilee Towey(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

12) Tim Hoang(Staff),
APT. 316, 1001 SPRING ST.
SILVER SPRING MD 20910

13) MONTGOMERY COMMUNITY TELEVISION, INC.
7548 STANDISH PLACE
ROCKVILLE MD 20855

14) NANNETTE O HOBSON
7548 STANDISH PLACE
ROCKVILLE MD 20855

15) MONTGOMERY COMMUNITY MEDIA
7548 STANDISH PLACE
ROCKVILLE MD 20855

16) JASMINE WHITE
7548 STANDISH PLACE
ROCKVILLE MD 20855


Mithun Banerjee