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## In The Circuit Court of Montgomery County, Maryland

Mithun Banerjee 13119 Fernedge Road, Silver Spring, MD-20906

Plaintiff(s),

V.

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 Roberts,

APT. 316, 1001 SPRING ST.

SILVER SPRING MD 20910

4) Chris Perry,

APT. 316, 1001 SPRING ST.

SILVER SPRING MD 20910

5) Josh Fischer

Office of the County Attorney

101 Monroe Street, Third Floor

Rockville, Maryland 20850

6) Vaughn Stewart,

Lowe House Office Building, Room 151,

6 Bladen St., Annapolis, MD 21401

7) Sofia Bushen

816 Easley ST Apt 1631

Silver Spring, Maryland 20910

8) Omar Lazo

2420 Blueridge Ave,

Wheaton, MD 20902

9) Yvette Monroe

8 Melvin Street #4021,

Gaithersburg, MD 20877

10) David Mullins,

APT. 316, 1001 SPRING ST.

SILVER SPRING MD 20910

11) Emilee Towey,

APT. 316, 1001 SPRING ST.

SILVER SPRING MD 20910

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\* Case Number: New Case

\* Requesting for jury Trial

\* Claim Amount-\$870,170+Punitive

Damages

C-15-CV-25-005578

12) Tim Hoang,
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

Defendants. \*

\* \* \* \* \* \* \* \* \* \* \* \*

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 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 24<sup>th</sup>, 2025 or before to Host a County Executive Forum on October 8<sup>th</sup>, 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 24<sup>th</sup>, 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 25<sup>th</sup>, 2025.

9) Mr. Matthew(Matt) Losak sent an email on behalf of MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED to Plaintiff on October 4<sup>th</sup>, 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 disqualify for attending the County Executive Forum hosted by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED on October 8<sup>th</sup>, 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 8<sup>th</sup>, 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 8<sup>th</sup>, 2025, MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED sent an email blast for the County Executive Forum scheduled for October 8<sup>th</sup>, 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 30<sup>th</sup>, 2025 as **Exhibit-D**.
- 13) Please find the email blast as <u>Exhibit-E</u>, sent by MONTGOMERY COUNTY RENTERS ALLIANCE, INCORPORATED dated September 25<sup>th</sup>, 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 8<sup>th</sup>, 2025 when Mr. Evan Glass was not Certified to receive Public Funds because Mr. Evan Glass got Certified on September 30<sup>th</sup>, 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 24<sup>th</sup>, 2025 & first email she received was on October 4<sup>th</sup>, 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.
- 16) 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,
- 17) 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 8<sup>th</sup>, 2025 & with three times Punitive Damages & Attorney Costs & Court Costs.

Respectfully submitted.

Mithun Banerjee

Dated-10/08/2025

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this \_8<sup>th</sup> day of October, 2025. I sent a copy of the foregoing request for discovery by Electronic Court System/emailed/U.S. mail, postage prepaid, to the Defendents 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 Roberts,

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