

THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
Civil Division

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FILED  
CIVIL ACTIONS BRANCH  
APR 05 2012  
Superior Court  
of the District of Columbia  
Washington, DC.

Makini R. Chaka )

Plaintiff )

v. )

Fred Davis )

Defendant )

Case No. 0000190-11  
Judge Laura Cordero

**PRE-TRIAL STATEMENT**

Pursuant to the court's request, I, Makini R. Chaka, Plaintiff, herein submit the following Pre-Trial Statement.

**STATEMENT OF THE NATURE OF THE ACTION**

This is an action for a Permanent Stay Away Order, damages and injunctive relief as a result of the Defendant's malicious, willful and intentional assault, injurious falsehood and civil conspiracy against the Plaintiff.

**GENERAL STATEMENT OF PLAINTIFF'S CASE**

In the early morning hours of January 6, 2011 Plaintiff Chaka was the victim of an assault and battery perpetrated by Defendant Davis inside of Josephine's nightclub located at 1008 Vermont Ave NW DC. The Defendant approached the Plaintiff twice with the intentions of physically assaulting and verbally attacking her; the first time the Defendant approached the Plaintiff grabbing her wrist and using profane language, the second time he ran behind the Plaintiff unbeknownst to her and dumped flasks of juice on her head and clothing then threw the flask at her mouth causing injury to the Plaintiff.

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The Plaintiff suffered visible injuries and sought medical attention. Plaintiff also filed a Police Report, which was altered for the Defendant due to his celebrity.

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The incident aired on the news and was published in various media outlets with the Plaintiff's (the victim's) photograph being aired after seeking a TRO. The Defendant spoke with several reporters and media outlets denying his assault of the Plaintiff and worked with the District of Columbia Police to back up his story.

The Defendant harassed the Plaintiff prior to the incident and continued thereafter, failing to abide by the guidelines of the Temporary Restraining Order granted to the Plaintiff by Judge Laura Cordero on February 11, 2011.

#79  
Those present with the Defendant in court on February 11, 2011 his longtime girlfriend and lawyer Jean Kuei and bodyguard Stewart Prince, since that court date have slandered the Plaintiff's name at places in which she conducted business. The Plaintiff has a business history of providing concierge and broker services to celebrities in the sports and entertainment industries and works closely with area nightclubs and venues. The Defendant and his associates have asked nightclubs to ban the Plaintiff spreading untruthful information that the Defendant is suing the Plaintiff and stating fallacies that the Plaintiff has several lawsuits against celebrities. The Defendant has asked Mr. Prince to talk to club staff and door personnel at events coordinated by the Plaintiff to have her removed from venues that she has contracts for. The Defendant has also called nightclubs from Mr. Prince's cell phone number impersonating his Washington Redskins teammates

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asking that the Plaintiff be not allowed into clubs to give the impression that the entire Redskins organization has problems with the Plaintiff. As a result of these negative, false and defamatory statements the Plaintiff is not allowed into several venues, has been denied business contracts and has lost a substantial amount of clients and business.

The Plaintiff has been harmed by the Defendant physically and has had her personal and business reputation tarnished through media and civil conspiracy carried out by the Defendant and his associates.

#### LIST OF EXHIBITS

1. Video of the Incident
2. Medical Records and Bills of the Plaintiff
3. Photographs of Injuries
4. Police Report
5. Proof of Process Serving Legal Papers to Defendant
6. Proof that Process Service was to Defendant's girlfriend/lawyer Jean Kuei's home
7. Articles and interviews where Defendant's girlfriend is listed as Jean Kuei
8. Televised News Snippet Showing Plaintiff's photograph
9. Radio Interview where a reporter tells Defendant's story denying the incident
10. Published News Articles with the Defendant denying the incident
11. Defendant's Criminal Record
12. Articles regarding Defendant's drug abuse
13. Video and Articles regarding other police altered Redskins stories in the news at the same time

14. Plaintiff's Proof of Registered Business and contracts
15. Proof that Plaintiff did business with Defendant
16. Letter from Defendant's Lawyer requesting nuisance settlement before trial and Plaintiff's response.
17. Deposition Transcript of Witness by DT Nation

#### **DEPOSITION EXHIBITS**

Plaintiff reserves the right to introduce any documents exchanged during the course of discovery that are not specifically identified above.

#### **PLAINTIFF'S LIST OF WITNESSES**

1. She'Dale Arrington
2. LaKeshia Bellamy
3. Charisle Harris
4. Shawn Morrison
5. Erica Yuille

#### **STATEMENT OF ADMITTED FACTS**

1. Defendant Davis, a player with the Washington Redskins initiated unwanted and malicious contact with the Plaintiff twice on January 6, 2011
2. Plaintiff suffered injuries from the Defendant's assault and received medical treatment
3. Plaintiff runs a small business as a celebrity broker to athletes and entertainers
4. Defendant is a former associate and client of the Plaintiff, they met in 2008
5. Defendant's bodyguard Stewart Prince was hired by the Plaintiff to work for several of her clients

6. Defendant's bodyguard told the Plaintiff that the Defendant was wrong and lacked self control in the incident
7. Defendant has a previous criminal record including a misdemeanor charge for giving false identification to an officer and was suspended from the Redskins for testing positive for drugs three (3) times
8. Articles and broadcasts related to the case have appeared on several media outlets including the Washington Post, ABC 7, 106.7fm radio and more.

*Makini R. Chaka*

**CERTIFICATE OF SERVICE**

Respectfully Submitted on this 5th day of April 2012.

*Makini R. Chaka*  
**Makini R. Chaka**

Plaintiff