

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

MAKINI R. CHAKA,)	
)	
Plaintiff,)	Civil Action No. 2011 CA 000190 B
)	
v.)	Courtroom A-50
)	Judge Laura A. Cordero
FRED DAVIS,)	
)	Next Event: Pretrial Conference,
Defendant.)	April 10, 2012
)	

**DECLARATION OF FRED DAVIS IN SUPPORT OF HIS OPPOSITION TO
PLAINTIFF'S EMERGENCY CONTEMPT MOTION FOR COURT ORDER**

I, Fred Davis, declare:

1. I am the Defendant in the above-entitled action.
2. I have complied with this Court's February 11, 2011 Order granting Plaintiff's Motion for a Preliminary Injunction and have no intention of violating it. I have never spoken to, assaulted, threatened, harassed or physically abused the Plaintiff. In fact, I have tried to make sure that the Plaintiff and I are not at the same venues, I have voluntarily left when she does arrive at any venue that I may be visiting and I have actually left venues without going inside because I was informed that she was there.
3. On Friday, November 18, 2011, I went to Bar 7 Restaurant located at 1015 7th Street, N.W., Washington, D.C. 20001 to attend a party with my teammate. I was also accompanied by a security officer, Stewart Prince. Mr. Prince was aware of this Court's February 11th Order. Shortly after I arrived, Bar 7's promoter Eric Taylor, escorted Plaintiff and her friends into the nightclub without informing me or Mr. Prince as he was unaware of the Court's Order. As soon as Mr. Prince saw Plaintiff, he immediately went to discuss the situation with the Head of Security and Mr. Taylor. Even though I had arrived at the venue first and was celebrating with

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my teammate, I told Mr. Prince that I was willing to voluntarily leave the venue because I did not want any problems with Plaintiff. Mr. Prince, the Head of Security and Mr. Taylor all witnessed me leaving the venue.

4. On Monday, November 28, 2011, I went to Club Eden located at 1716 I Street, N.W., Washington, D.C. 20006 and was accompanied by Mr. Prince. Plaintiff was not there when I arrived, but I knew that a Baltimore Ravens player was throwing a party there, so there was a possibility that Plaintiff may show up. As a result, Mr. Prince informed the Head of Security at Club Eden to notify him if Plaintiff showed up and also apprised him of the Court's February 11th Order. The Head of Security told Mr. Prince that Plaintiff should leave if she showed up because I was there first, but I was willing to leave in order to avoid any issues with the Plaintiff. Plaintiff did arrive at the venue later that night and made a huge scene when she was not immediately allowed into the Club, so I voluntarily and quickly left the venue. I never told the Head of Security or Mr. Prince not to let Plaintiff into the venue if she arrived.

5. On or around Saturday, December 3, 2012, I attended a party hosted by Promoter Eric Taylor at Café Asia located at 1720 I Street, NW, Washington, D.C. 20006. Plaintiff was not present when I arrived. I was accompanied by Mr. Prince, who reminded Mr. Taylor of the Court's February 11th order in case Plaintiff showed up. Mr. Taylor told Mr. Prince that she would not be allowed into the venue if she showed up irrespective of this Court's February 11th Order because of her disruptive behavior at Bar 7 from the previous incident on November 18, 2011. Mr. Taylor told Mr. Prince that Plaintiff was upset even though I left the Club that night, pulled the Order out of the purse to show everyone, caused a scene and called the police to try to apprehend me. Mr. Taylor said that she was unreasonable, unprofessional and very bad for business. I had nothing to do with Mr. Taylor's decision not to let Plaintiff in the Club that

evening.


6. I have tried my best to avoid Plaintiff and not be at any venues that she will be present. On those few occasions in which we have ended up at the same place and she has arrived after me, I have left the scene without saying anything to her. And if she is at a venue before me, I have voluntarily left without saying a word to her. For instance, about a year ago in March of 2011, I attempted to go to Josephine's Nightclub, but when I learned that she was inside, I voluntarily left with no problem. I have tried to avoid the Plaintiff at all costs because I know that she will cause a scene, twist the facts in court and lie in order to extort money from me. #93

7. I have never told any Club promoters or owners not to let Plaintiff into any venue. From what I understand, Plaintiff is banned from several venues by her own disruptive, violent and litigious behavior. Mr. Prince told me that Plaintiff started a fight with a female stripper at Stadium Nightclub about 2 years ago and tried to sue the nightclub as a result of it. Mr. Prince also told me that about one month ago, Plaintiff got into a fight with and threw bottles at the wife of a popular DJ from 93.9 (DJ Quicksilver) at Club Mirage located in Baltimore Maryland. Mr. Prince told me that many club owners and promoters in the Washington, D.C. area know of Plaintiff's propensity for violence and drama, her disruptive behavior and legal threats. #94

Wherefore, I request that the court find that I, Fred Davis, have not willfully disobeyed the Order of this Court on February 11, 2011, and that this proceeding be dismissed,

declare under penalty of perjury under the laws of Virginia that the above is true and correct.

Executed, this 4th day of April, 2012.



Fred Davis

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**DECLARATION OF STEWART PRINCE IN SUPPORT OF HIS OPPOSITION TO
PLAINTIFF'S EMERGENCY CONTEMPT MOTION FOR COURT ORDER**

I, Stewart Prince, declare:

1. I know both the Defendant and Plaintiff in the above-entitled action. I know Plaintiff from her work in the Washington, D.C. area as a "madam/pimpette" who provides escorts to high-profile athletes and entertainers. It is well-known in the sports and entertainment industry, particularly in the Washington, D.C. metropolitan area, that the Plaintiff recruits women to work for her and provide sexual favors to athletes or other entertainer in exchange for money. Plaintiff often carries her "pimp-cup" with her, is acquainted with other well-known pimps including Bishop Don Juan (the "Bishop") and frequently attends the Bishop's Players' Ball with her female escorts. I have seen the You-Tube video-interview by "Hip-Hop Honeys" of Plaintiff dressed in all-green and holding a "pimp-cup," claiming herself as a "pimpette" (saying she is dressed in green because "green is for the money and gold is for the honeys") while escorting two women to the 2010 Player's Ball for pimps; also available at:

http://www.youtube.com/watch?v=Q91_i9XDzNY&feature=youtube_gdata_player.

2. Plaintiff has a very unsavory reputation in the Washington, D.C. area. I am a friend of

the Plaintiff on Facebook and have seen her post many obscene and sexually-explicit pictures on her page, including pictures of one of her escorts grabbing a man's penis and another picture of her allowing herself to be licked in the crotch area. I have also seen many pictures of Plaintiff on her Facebook page holding her "pimp-cup." True and correct copies of the pictures are attached hereto.

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3. I personally know at least two women who Plaintiff attempted to recruit to work for her in this capacity. Because I provide personal security to athletes and entertainers in this area, I have had occasion to observe Plaintiff's interaction with my clients. Plaintiff and I are casual acquaintances and we still have each other's telephone numbers. The last time I communicated with her was on February 16, 2012 to let her know that Mr. Davis would not be at a club that she wanted to visit.

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4. I know Mr. Davis from providing personal security for him when he goes out to nightclubs in the Washington, D.C. area. I am aware of this Court's February 11, 2011 Order and I make sure that he is not around the Plaintiff when he goes out to venues in D.C. Mr. Davis has told me repeatedly that he does not want to be anywhere near the Plaintiff and that he is willing to leave the venue if she shows up even if he has arrived first, in order to avoid further legal problems with her.

5. I have never seen Mr. Davis assault, harass, threaten, physically abuse or even speak to the Plaintiff since this Court's February 11, 2011 Order. I have never witnessed Mr. Davis speak to any Club owners, promoters or security personnel about this Court's Order or tell them not to

let the Plaintiff into a particular venue. I am always the person that speaks to the Club owners, promoters or security personnel if there is a situation in which Mr. Davis and the Plaintiff are at the same venue. Once again, Mr. Davis always tells me that he would rather leave than have any problems with the Plaintiff and he has never told me to try to keep Plaintiff out of a venue.

6. I was with Mr. Davis on all of the occasions raised by Plaintiff in her Emergency Contempt Motion for Court Order. On Friday, November 18, 2011, I went to Bar 7 Restaurant located at 1015 7th Street, N.W., Washington, D.C. 20001 with Mr. Davis as he was attending a party with his teammate. Shortly after we arrived, Bar 7's promoter Eric Taylor, escorted Plaintiff and her friends into the nightclub without informing me as he was unaware of the Court's February 11, 2011 Order. As soon as I saw Plaintiff, I immediately went to discuss the situation with the Head of Security and Mr. Taylor. Even though we had arrived at the venue first and Mr. Davis was celebrating with his teammate, Mr. Davis told me that he would leave the venue because he did not want any problems with the Plaintiff. Bar 7's Head of Security, Mr. Taylor and I witnessed Mr. Davis leave the venue. Throughout this entire incident, Mr. Davis never exchanged words or even looks with the Plaintiff.

7. On Monday, November 28, 2011, I went to Club Eden located at 1716 I Street, N.W., Washington, D.C. 20006 with Mr. Davis. Plaintiff was not there when we arrived, but I knew that a Baltimore Ravens player was throwing a party there, so there was a possibility that Plaintiff may show up. As a result, I informed the Head of Security at Club Eden to notify me if Plaintiff showed up and also apprised him of the Court's February 11th Order. The Head of Security told me that Plaintiff should leave if she showed up because Mr. Davis was there first,

but I told him that we did not want any problems with her. Plaintiff did arrive at the venue later that night and made a huge scene when she was not immediately allowed into the Club, so Mr. Davis and I voluntarily and quickly left the venue. I never told the Head of Security or Mr. Prince not to let Plaintiff into the venue if she arrived. During this entire incident, Mr. Davis never exchanged words or even looks with the Plaintiff.

8. On or around Saturday, December 3, 2012, I attended a party hosted by Promoter Eric Taylor at Café Asia located at 1720 I Street, NW, Washington, D.C. 20006 with Mr. Davis. Plaintiff was not present when we arrived. I reminded Mr. Taylor of the Court's February 11th order in case the Plaintiff showed up. Mr. Taylor told me that she would not be allowed into the venue if she showed up irrespective of this Court's February 11th Order because of her disruptive behavior at Bar 7 from the previous incident on November 18, 2011. Mr. Taylor told me that Plaintiff was irate even though Mr. Davis left the Club that night, that she pulled the Order out of her purse to show everyone, that she caused a scene and called the police to try to apprehend Mr. Davis and start problems with Bar 7. Mr. Taylor said that she was unreasonable, unprofessional and very bad for business. Neither Mr. Davis or I had anything to do with Mr. Taylor's decision not to let Plaintiff in the Club that evening.

9. I have personally witnessed Mr. Davis trying his best to avoid Plaintiff and not be at any venues that she will be present. On those few occasions in which they have ended up at the same place, even if he arrived first, he has left the scene without saying anything to her. And if Plaintiff shows up at a venue before Mr. Davis, he has voluntarily left without saying a word to her or even looking in her direction. For instance, about a year ago in March of 2011, Mr. Davis

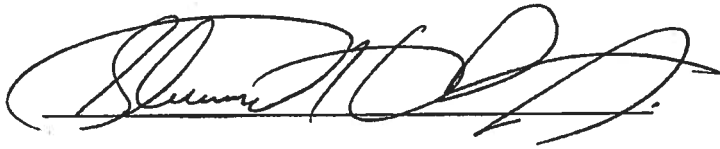
attempted to go to Josephine's Nightclub, but when we learned that she was inside, he voluntarily left without any problem.

10. I was hoping that Plaintiff would let this lawsuit go after she got this Court's February 11th Order, but it appears that she is out to extort and embarrass Mr. Davis because she is enraged with him. From what I understand, she is upset with Mr. Davis because she went out of her way to befriend him and went to Los Angeles to party with him years ago even though he never told her to come. When she arrived in Los Angeles, she called him to pick her up and when he refused, she became infuriated with him. Since that time, she has had a personal vendetta against him.

11. A couple years ago, Plaintiff got into a fight with a female stripper at Stadium Nightclub and tried to sue the nightclub as a result of it, but the lawsuit was dismissed. About one month ago, Plaintiff got into a fight with and threw bottles at the wife of a popular DJ from 93.9 (DJ Quicksilver) at Club Mirage located in Baltimore Maryland. Plaintiff has been banned by the promoter of Josephine's and Club Mirage, Van Ashe, for her violent behavior at Club Mirage. Many club owners, security personnel and promoters in the Washington, D.C. area know of Plaintiff's unsavory reputation, propensity for violence and drama, her disruptive behavior and legal threats. They have told me that they are willing to testify in this matter because they have personally witnessed the incidences in question and know that Plaintiff is lying about them in an attempt to harm Mr. Davis.

I declare under penalty of perjury under the laws of Maryland that the above is true and correct.

Executed, this 4th day of April, 2012.

A handwritten signature in black ink, appearing to read "Stewart Prince", written over a horizontal line. The signature is highly stylized and cursive.

Stewart Prince