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**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

MICHAEL MUHAMMAD,
4855 Saint Barnabas Road, Apt 1
Temple Hills , Maryland 20748

Plaintiff,

v.

THE DISTRICT OF COLUMBIA,

*Serve: Office of the Gen Reg
The Hon. Brown - A. J. Frankson
1350 Pennsylvania Ave NW, S474219*
Serve: Office of the Attorney General
441 4th Street, NW, Suite 1145S
Washington, D. C. 20001

Civil Action No. 0007874-09

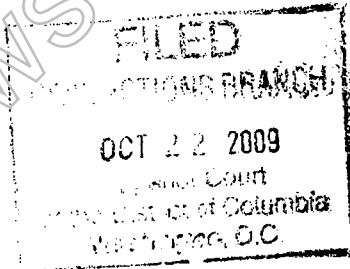
and

**BOARD OF CHILD CARE OF UNITED
METHODIST CHURCH, INCORPORATED**

3300 Gaither Road
Baltimore, Maryland 21244

Serve: Thomas L. Curico, Jr.

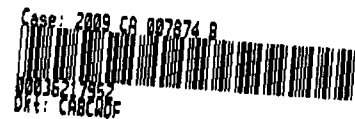
Defendants.



COMPLAINT OF WRONGFUL DEATH AND NEGLIGENCE

I. INTRODUCTION

1. Plaintiff Michael Muhammad, by his attorneys, Maynard Henry, Sr., Sharon I. Theodore-Lewis, Richard E. Patrick and Patrick Henry LLP, and brings this action against the defendant District of Columbia pursuant to the District of Columbia Code §12-309 (as amended) providing for relief of claims against the District of Columbia in personal tort actions. Plaintiff filed his Notice of Claim [Claim # 0801352] against the District of Columbia on March 10, 2009,



pursuant to D.C. Code Section 12-309, and has exhausted his administrative remedies.

Plaintiff also brings this action against the Board of Child Care of United Methodist Church, Incorporated, for actions arising out of the death of Humble Souljourna Muhammad (hereinafter "minor child").

II. JURISDICTION AND VENUE

2. The conduct of which the Plaintiff complains, took place in the District of Columbia and the Defendants are located in the District of Columbia and/or the conduct arises under the laws of the District of Columbia. Jurisdiction of this Court is invoked pursuant to District of Columbia Section 11-921, amended.

III. PARTIES

3. Plaintiff, Michael Muhammad, is a citizen of the United States and of the State of Maryland, residing at 4855 Saint Barnabas Road, Apt. 1, Temple Hills, Maryland 20748.

4. Defendant, The District of Columbia is a municipality.

5. Defendant, Board of Child Care of United Methodist Church, Incorporated is a corporation licensed to do business in the District of Columbia, and is a Non-stock incorporation formed in the State of Maryland.

IV. STATEMENT OF FACTS

6. Michael R. Muhammad, the plaintiff is the biological father of Humble Souljourna Muhammad. The body of Plaintiff's deceased child (birth name, Humble Souljourna Muhammad) was found on or about Friday, September 26, 2008 by Montgomery County Police officers. Mr. Muhammad first became aware of his daughter's death on or about October 24, 2008, when he received a call that his daughter was found dead.

7. Souljourna was killed by her adoptive mother, Renee Bowman and it is believed this murder took place in the state in which Ms. Bowman lived, which was Maryland, however, Souljourna was adopted in the District of Columbia. According to Lieutenant Paul Starks of the Montgomery County Police Department, it is believed that Renee Bowman killed Plaintiff's child and another adopted child while living in her Rockville, Maryland, home. Ms. Bowman later moved to Lusby, Maryland. The remains of Plaintiff's child and that of another child were found at Renee Bowman's home in Lusby, (Calvert County) Maryland in a freezer.

8. It is believed that Plaintiff's child was murdered by her adoptive mother Renee Bowman which, said adoption was approved by the District of Columbia, but without proper notice nor approval of Plaintiff.

9. Prior to Souljourna's adoption by Ms. Renee Bowman, she was in the care and custody of the District of Columbia, Child and Family Services Agency. The District of Columbia and Board of Child Care of United Methodist Church, Incorporated, failed to protect Plaintiff's daughter from an adoptive parent that was unfit to adopt. Ms. Bowman, amongst other things, prior to the adoption, was convicted of threatening bodily harm to a 72-year-old motorist, had an abusive mate, filed for bankruptcy protection in 2001. Ms. Bowman described her childhood to friends as akin to that of "an abused dog." Her mother was a homeless wanderer of the District of Columbia. But for the actions and inactions of the District of Columbia, who had custody and care of Humble S. Muhammad, Ms. Bowman would not have been allowed to adopt the child because she did not meet basic eligibility requirements to be an adoptive parent. It is because of the District's failure, that Mr. Muhammad's daughter is now deceased.

10. But for the actions and inactions of the Board of Child Care of United Methodist Church,

Incorporated, who upon information and belief, was hired by the District of Columbia to conduct a proper and thorough investigation and background of Renee Bowman, and failed to do so; and had a proper and thorough investigation and background check been done, Ms. Bowman would not have been allowed to adopt the child because she did not meet basic eligibility requirements to be an adoptive parent. It is because of the District's failure, and the Board of Child Care of United Methodist Church, Incorporated's failure, that Mr. Muhammad's daughter is now deceased.

11. That the D.C., Child and Family Services Agency failed to evaluate Ms. Renee Bowman as being a suitable foster and adoptive parent. That the District of Columbia's agent, the Board of Child Care of the United Methodist Church, failed to take adequate measures to qualify Ms. Bowman as a proper adoptive parent. That the District of Columbia failed to properly supervise its contractor.

12. Mr. Muhammad never approved of the adoption of his child. Mr. Muhammad was only given informal and improper notice of the proposed adoption just prior to a hearing to finalize the adoption. Mr. Muhammad's rights as a natural parent were violated under District of Columbia law. Mr. Muhammad's daughter's rights were violated as well, culminating in her death due to the actions and inactions of the Defendants.

13. Upon information and belief, Renee Bowman has plead guilty in Calvert County, Maryland to first degree child abuse, and is currently awaiting trial on murder charges in Montgomery County, Maryland.

V. STATEMENT OF CLAIMS

COUNT I - WRONGFUL DEATH

14. Plaintiff restates and re-pleads the allegations of paragraphs 1-13, and avers that the conduct of the Defendants constitute Wrongful Death, under the Wrongful Death Act, D.C.C.E. §§ 16-2701 to 2703.

15. That the Defendant District of Columbia had a duty to protect said minor child and failed to do so.

16. That the D.C., Child and Family Services Agency failed to evaluate Ms. Renee Bowman as being a suitable foster and adoptive parent.

17. The Defendant the Board of Child Care of the United Methodist Church, had a duty to properly and thoroughly investigate the prospective adoptive parent and failed to take adequate measures to qualify Ms. Bowman as a proper adoptive parent.

18. As a direct and proximate result of the actions or omissions of the defendants said minor child was murdered by the adoptive parent Renee Bowman.

COUNT II - SURVIVAL ACT

19. Plaintiff restates and re-pleads the allegations of paragraphs 1-18, and avers that the conduct of the Defendants constitutes Wrongful Death, and brings an action under the Survival Act, D.C.C.E. §§ 12-101 and 16-2701, *et seq.*

20. That the defendants had a duty to protect said minor child and that the defendants breached said duty.

21. As a direct and proximate result of the actions or omissions of the defendants said minor child was murdered by the adoptive parent Renee Bowman.

COUNT III - NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

22. Plaintiff re-alleges and incorporates the allegations of paragraphs 1 through 21 above and in addition avers that:

23. Defendants' conduct in allowing Plaintiff child to be adopted by an unfit adoptive parent, and in violation of Plaintiff's Due Process Rights to know of and consent to said adoption; and

24. That the D.C., Child and Family Services Agency failed to evaluate Ms. Renee Bowman as being a suitable foster and adoptive parent. That the District of Columbia's agent, the Board of Child Care of the United Methodist Church, failed to take adequate measures to qualify Ms. Bowman as a proper adoptive parent. That the District of Columbia failed to properly supervise its contractor. That the Defendant's actions caused the death of Plaintiff's child. Defendants' conduct constitutes negligent infliction of emotional distress.

25. As a direct and proximate result of the actions or omissions of the defendants or its agents as alleged above in paragraphs 1 through 24, and the consequences proximately caused thereby, Plaintiff has suffered emotional trauma, loss of benefits, distress, mental anguish, and other related costs.

VI. PRAYER FOR RELIEF

26. Wherefore, Plaintiff prays for a judgment in his favor and against the defendants, jointly and severally, and that the following relief be awarded to the Plaintiff:

1) On Count I for violation of the Wrongful Death Act, compensatory damages in the amount \$25,000,000.00;

2) On Count II for violation of the Survival Act, compensatory damages in the amount \$25,000,000.00;

- 3) On Count III for Negligent Infliction of Emotional Distress compensatory damages in the amount \$25,000,000.00;
- 4) Grant plaintiff his attorney's fees and costs;
- 5) Grant such additional relief as the Court deems just and proper.

JURY DEMAND

Plaintiff Michael Muhammad, hereby demands a trial by jury in the above-entitled action on each and every count.

Respectfully submitted,

MICHAEL MUHAMMAD

By Counsel

PATRICK HENRY LLP

By: 

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