

STATE OF INDIANA)
)
COUNTY OF MARION)
)

IN THE MARION COUNTY COURT

) SS:

CAUSE NO. 49D132310 CT 030673

MMOJA AJABU

Plaintiff,

v.

MARKET EAST PORTFOLIO LLC
Defendant.

FILED

208 OCT 10 2023

Katherine E. Swana Boce
CLERK OF THE MARION CIRCUIT COURT

COMPLAINT FOR DAMAGES

Plaintiff, Mmoja Ajabu, pro se for his complaint against the Defendant, respectfully alleges and states as follows:

The Parties

1. The Defendant, Market East Portfolio, LLC, is a Limited Liability Company with its principal office at 350 East New York Street, Suite 200, Indianapolis, IN, 46204.
2. Market East Portfolio, LLC is the owner of the property located at 251 East Ohio Street, Indianapolis, Indiana 46204.
3. Market East Portfolio, LLC leases office space to the Marion County Prosecutor's Office within its building located at 251 East Ohio Street.
4. Mmoja Ajabu is a resident in the city of Indianapolis, Marion County, Indiana.

Background

5. Pursuant to the Prosecutor's responsibilities, the Prosecutor and its records must be available to the citizenry.
6. On or about September 26, 2023 Mmoja Ajabu attempted to conduct business with the Marion County Prosecutor and entered the property located at 251 East Ohio Street, Indianapolis, Indiana in order to speak with the Prosecutor.

DEMAND FOR JURY TRIAL

The Plaintiff respectfully demands a jury trial.

Respectfully submitted,

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following on or before October 4, 2023 by certified mail:

Market East Portfolio, LLC
111 Monument Circle, Suite 2700
Indianapolis, IN, 46204

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

STATE OF INDIANA) IN THE MARION COUNTY COURT
) SS:
 COUNTY OF MARION) CAUSE NO. 49D132310 CT039673
)

MMOJA AJABU)

Plaintiff,)

v.)

MARKET EAST PORTFOLIO LLC)
 Defendant.)

FILED
 (208) OCT 10 2023
Katherine Swana Bice
 CLERK OF THE MARION CIRCUIT COURT

COMPLAINT FOR DAMAGES

Plaintiff, Mmoja Ajabu, pro se for his complaint against the Defendant, respectfully alleges and states as follows:

The Parties

1. The Defendant, Market East Portfolio, LLC, is a Limited Liability Company with its principal office at 350 East New York Street, Suite 200, Indianapolis, IN, 46204.
2. Market East Portfolio, LLC is the owner of the property located at 251 East Ohio Street, Indianapolis, Indiana 46204.
3. Market East Portfolio, LLC leases office space to the Marion County Prosecutor’s Office within its building located at 251 East Ohio Street.
4. Mmoja Ajabu is a resident in the city of Indianapolis, Marion County, Indiana.

Background

5. Pursuant to the Prosecutor’s responsibilities, the Prosecutor and its records must be available to the citizenry.
6. On or about September 26, 2023 Mmoja Ajabu attempted to conduct business with the Marion County Prosecutor and entered the property located at 251 East Ohio Street, Indianapolis, Indiana in order to speak with the Prosecutor.

DEMAND FOR JURY TRIAL

The Plaintiff respectfully demands a jury trial.

Respectfully submitted,

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following on or before October 4, 2023 by certified mail:

Market East Portfolio, LLC
111 Monument Circle, Suite 2700
Indianapolis, IN, 46204

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

STATE OF INDIANA)
COUNTY OF MARION)
MMOJA AJABU)
Petitioner,)
v.)
MARKET EAST PORTFOLIO LLC)
Respondent.)

IN THE MARION COUNTY COURT
SS:
CAUSE NO. 49D132310 CT039673

FILED

(208) OCT 10 2023

Katherine Lucena Bell
CLERK OF THE MARION CIRCUIT COURT

**EMERGENCY VERIFIED PETITION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY AND PERMANENT INJUNCTION AND
COMPLAINT FOR DAMAGES**

Petitioner, Mmoja Ajabu, pro se for his complaint against the Respondent, respectfully alleges and states as follows:

The Parties

1. The Respondent, Market East Portfolio, LLC, is a Limited Liability Company with its principal office at 350 East New York Street, Suite 200, Indianapolis, IN, 46204.
2. Market East Portfolio, LLC is the owner of the property located at 251 East Ohio Street, Indianapolis, Indiana 46204.
3. Market East Portfolio, LLC leases office space to the Marion County Prosecutor's Office within its building located at 251 East Ohio Street.
4. Mmoja Ajabu is a resident in the city of Indianapolis, Marion County, Indiana.

Background

5. Pursuant to the Prosecutor's responsibilities, the Prosecutor and its records must be available to the citizenry.

- the people peaceably to assemble, and to petition the Government for a redress of grievances.
18. Mmoja Ajabu went to Prosecutor Ryan Mear's office to petition the government for a redress of a grievance.
 19. The Respondent prevented Mmoja Ajabu from exercising his First Amendment Constitutional Right.
 20. The building owner who is the landlord of the Marion County Prosecutor's office has inserted himself as a governor of the government.
 21. The United States Constitution does not authorize a private citizen to impede citizens from conducting business with a government office because the office is located in the private citizen's building.
 22. Mmoja Ajabu is a tax paying citizen of Indiana Marion County.
 23. Mmoja Ajabu's tax money pays the prosecutor's rent.
 24. The Marion County City County Council should not allow the Marion County Prosecutor to use taxpayer's money to rent from the Respondent who impedes citizens access to the prosecutor's office.
 25. Respondent's actions caused Mmoja Ajabu mental anguish.
 26. Respondent tortiously interfered with Mmoja Ajabu and the Prosecutor's business relationship.
 27. Respondent was without authority to tell Mmoja Ajabu that he could not enter the building to conduct business with the Prosecutor.

REQUEST FOR TEMPORARY RESTRAINING ORDER

28. Rhetorical paragraphs 1-27 are incorporated by reference as if fully stated herein.

The undersigned hereby affirms that the foregoing representations are true.

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

Respectfully submitted,

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

DEMAND FOR JURY TRIAL

The Petitioner respectfully demands a jury trial.

Respectfully submitted,

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following on or before October 9th, 2023 by certified mail:

¹⁰
Market East Portfolio, LLC
111 Monument Circle, Suite 2700
Indianapolis, IN, 46204

/s/ Mmoja Ajabu
Mmoja Ajabu, pro se