

NOTICE OF REMOVAL

EXHIBIT 2



Superior Court of the District of Columbia
 CIVIL DIVISION – Civil Actions Branch
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
 Telephone (202) 879-1133 Website www.dccourts.gov

FILED
 CIVIL DIVISION
 SEP 10 2026
 Superior Court of the
 District of Columbia

Case No 2026 6380

COMPLAINT

Jurisdiction of this Court is founded on D.C. Code § 11-921

Junel Jeffrey
 PLAINTIFF

[REDACTED]
 Address (No Post Office Boxes)

Washington, DC
 City State Zip Code

[REDACTED]
 Telephone Number

[REDACTED]
 Email Address (optional)

vs

Charles M Spears
 DEFENDANT

529 Bittersweet Rd
 Address (No Post Office Boxes)

Lansing, KS 66043
 City State Zip Code

301-957-0771, 727-821-0053
 Telephone Number

chase-spears@hotmail.com
chase-spears@hotmail.com
 Email Address (optional)

- 1 Write a short and plain statement of your claim, including any relevant facts, dates, and locations

See attached

- 2 What relief are you requesting from the Court? Include any request for money damages

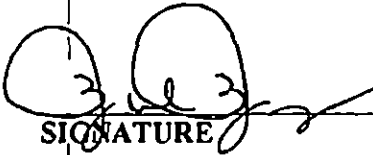
See attached

3 State any other information, of which the Court should be aware

See attached

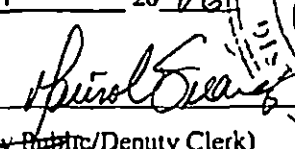
SIGNATURE

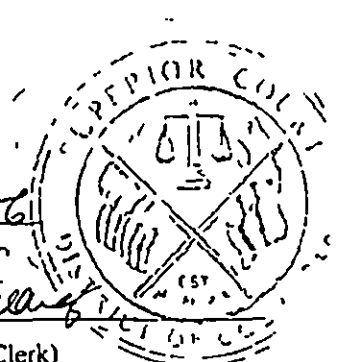
To the best of my knowledge, everything in this Complaint is true and I am not filing this Complaint to harass the Defendant(s) Superior Court Civil Rules 11(b)


SIGNATURE

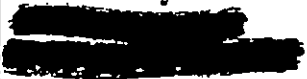
10 September 2026
DATE

Subscribed and sworn to before me this 10th day of Sept. 20 26


(Notary Public/Deputy Clerk)



Superior Court of the District of Columbia
CIVIL DIVISION – Civil Actions Branch
500 Indiana Avenue, N W , Suite 5000 Washington, D C 20001
Telephone (202) 879-1133 Website www.dccourts.gov

Junel Jeffrey  <i>Plaintiff</i> v Charles M Spears 529 Bittersweet Rd Lansing, KS 66043 <i>Defendant</i>	Case No <u>2026 6380</u> Judge _____ COMPLAINT FOR DEFAMATION (LIBEL & SLANDER) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS JURY TRIAL DEMANDED
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COMPLAINT

Plaintiff Junel Jeffrey ("Plaintiff"), pro se, hereby files this Complaint against Defendant Charles M Spears, also known as "Chase" Spears, ("Defendant"), and alleges as follows

I. JURISDICTION AND VENUE

- 1 This Court has jurisdiction over this matter pursuant to D C Code § 11-921, as the amount in controversy exceeds the jurisdictional minimum of this Court
- 2 Venue is proper in this Court pursuant to D C Code § 13-423 because the claims arose in the District of Columbia, the Defendant resides in the District of Columbia, and the tortious injury occurred within the District of Columbia

II PARTIES

3 Plaintiff is a private individual residing at 1224 42nd PL, NE, Washington, DC

4 Defendant is an individual residing at 529 Bittersweet Rd , Lansing, KS 66043

III. FACTUAL ALLEGATIONS

5 Plaintiff is a private citizen and is neither a public official nor a public figure

6 On or about September 11, 2025, Defendant authored and published a written statement on X (formerly known as Twitter) and LinkedIn social media platforms

7 The written statement explicitly stated *' This is now former U S Army public affairs officer Junel Jeffrey Until today, she worked in the Pentagon at the office of Army Communication and Outreach I never worked with her, but Junel stood out to me in the closed public affairs facebook page as one not to be trusted When I warn people that the military has an enemy within problem, multiply that by a factor of 10 when it comes to the #PublicAffairs force The preponderance of its officers and NCOs were left of center and hostile to Constitutional values long before the Obama Administration dragged the entire defense complex into the realm of progressive activists The field has long lacked professionalism something I warned of in writing for years to no avail Junel was the only one brazen enough to make a public statement celebrating Charlie Kirk's assassination But she's representative of a sizeable portion of her peers This is the real extremism in the force that Lloyd Austin refused to do anything about #RevolutionariesintheRanks*

8 Furthermore, on September 23, 2025, the Defendant expanded his false assertions through the publication RedState that explicitly stated “ *Having served in the U S Army for 20 years, I found former Defense Secretary Lloyd Austin s partisan assertion that there was an infestation of extremism loose in the U S military fictional and insulting But I have now seen it with my own eyes It s time for a mea culpa* ” “*I awoke on Thursday September 11th with the kind of sadness for our country that compared to what I felt on September 12 2001 the morning after the twin towers fell in New York* ” “*Did it really happen? ’ I asked myself as a college student, hoping it was all a terrible nightmare Back in the present, I looked at my phone to see a message from a colleague He shared a screen capture of Army Col Junel Jeffrey s take on Charlie Kirk’s assassination “Sometimes we reap what we sow That is all ”* ” “ *We failed to defeat Al Qaeda over the course of two decades Worse still, we allowed the American left wing to import that foreign terrorist association’s agenda, tactics, and desired end state violent destruction of those marked as ‘infidels ’ Then we gave these neo-Qaeda agents safe harbor in the ranks of our military Perhaps it s time to reflect on the reality that a force that welcomed anti-American extremists in its ranks was ineffective at defeating extremists abroad* ” “*I served with left-leaning soldiers early in my career But none openly hated the nation Thus, the armed forces became a target in the same way that revolutionaries targeted militaries as critical centers of gravity in every totalitarian-enabling murderous revolution of the 20th century By 2020, the American military joined in on the bandwagon of our nation being in need of a redemption that could come only through* ”

Marxist self-loathing Following that lead, there is a growing group of military members using the language of critical theorists in lambasting constitutional principles—words like homophobic, xenophobic, anti-immigrant—language of enemy ideologies that should be resoundingly rejected by the troops. They don't know what 'fascist' means any more than they know what's in the U.S. Constitution. Reports are coming in of military 'leaders' up to general officer ranks sharing similar things verbally.

"In the past few days, we have seen that thousands of military members embrace evil self-outed through social media posts celebrating Charlie Kirk's assassination. This level of depravity is far beyond what my worst fears had been of today's mercenary force that has proven so friendly to the extreme left wing of American politics since 2010. Search #RevolutionariesintheRanks if you want to get a personal look at the scale of this crisis that the public dare not ignore."

"Former Secretary of Defense under the Biden Administration Lloyd Austin went on a 60-day hunt for alleged rightwing extremists in the force and couldn't find them. His fishing expedition looked in the wrong direction. Austin should have been looking for troops who believe that holding to a traditional worldview is a qualification for the death penalty by vigilante. That search would have reaped a harvest and it's the exact kind of hunt the Department of War must now commence."

- 9 These written statements are entirely false assertions of fact accusing the Plaintiff of a crime of moral turpitude and directly impugn the Plaintiff's professional fitness. Also, I believe verbal statements were made to various individuals.

- a The Army officially reassigned Plaintiff to a different organization and role on August 14, 2025 – nearly one month prior to the online declaration from the Defendant
- b Plaintiff maintains a top-secret clearance, has no previous or active participation in prohibited behaviors that use, promote, or threaten unlawful violence, hatred or widespread discrimination to achieve ideological, political, or religious goals
- c In keeping with military regulatory guidance within the Uniform Code of Military Justice, Plaintiff has never advocated the overthrow of the U S government, recruited, organized or lead an extremist group, raised or given material support to such groups, demonstrated or rallied in support of extremist agendas, displayed extremist symbols, flags, tattoos, or bumper stickers, or liked or shared or posted extremist content online with the intent to promote it
- d Furthermore, Plaintiff has multiple military evaluations penned by senior officers that illustrate her true propriety, character, and ongoing exemplary service in defense of the United States

10 Defendant published these statements to third parties, and they were read and heard by numerous individuals in the District of Columbia community and to countless people around the world who follow the Defendant online (7,225 via X and 2,224 via LinkedIn) and those who shared his posts. Compounding this harm, on September 23, 2025, the Defendant expanded and republished these false assertions through RedState, a prominent online conservative news media outlet boasting a vast public reach of over 8 million monthly page views. These publications contained malicious, false, and highly

misleading assertions directly attacking the Plaintiff's professional execution of duties, character, and institutional integrity

11 Defendant failed to exercise reasonable care to ascertain the truth or falsity of these statements before publishing them, thereby acting negligently

12 As a direct and proximate result of Defendant's false, negligent, and defamatory statements, Plaintiff has suffered severe harm to her personal and professional reputation and emotional distress

IV. COUNT I

(Defamation – Libel and Slander)

Plaintiff incorporates by reference paragraphs 6 through 8 as fully set forth herein

13 Defendant's written and verbal statements concerning Plaintiff were defamatory, false, and not privileged

14 Defendant published the statements to third parties without Plaintiff's consent

15 Because Plaintiff is a private citizen, the applicable standard of fault is negligence

Defendant acted negligently by failing to act as a reasonably careful person would under similar circumstances to verify the truth of the statement before publishing it

16 The publication of these statements has caused special and general damages to Plaintiff's reputation and livelihood

V. COUNT II

(Intentional Infliction of Emotional Distress)

- 17 Plaintiff, COL Junel Jeffrey, incorporates by reference and re-alleges each and every allegation contained in paragraphs 6 through 8 of the Statement of Facts as though fully set forth herein
- 18 Beginning on September 11, 2025, and compounded on September 23, 2025, the Defendant, Dr Charles M Spears, engaged in extreme and outrageous conduct by designing, publishing, and deliberately propagating highly inflammatory, false, and malicious statements targeting the Plaintiff across global social media channels (X/Twitter and LinkedIn) and via a mass-media conservative outlet (RedState), which maintains a reach exceeding 8 million monthly page views
- 19 The Defendant's conduct goes completely beyond all possible bounds of decency, and is to be regarded as atrocious and utterly intolerable in a civilized community As a retired military Public Affairs Officer, the Defendant knew—or recklessly disregarded—that weaponizing a massive online audience with volatile falsehoods against a high-ranking military leader would foreseeably trigger severe public hostility, harassment, and immediate physical safety threats
- 20 The Defendant acted intentionally or with reckless disregard for the certainty that severe emotional distress and physical peril would result to the Plaintiff from his publications
- 21 As a direct and proximate result of the Defendant's extreme and outrageous online publications, third-party actors targeted the Plaintiff with explicit safety threats within 24 hours of publication, completely fracturing the Plaintiff's safety and forcing her to seek emergency intervention from law enforcement, execute physical home security modifications, and deploy advanced data-scrubbing protocols

- 22 As a further direct and proximate result of the Defendant's conduct, the Plaintiff suffered, and continues to suffer, severe emotional distress, profound trauma, and a severe clinical recurrence of acute anxiety. This intense psychological injury has been formally treated and documented by a licensed mental health professional, who explicitly identifies the Defendant's multi-platform campaign as the proximate cause of the medical trauma.
- 23 The Defendant's extreme and outrageous conduct has been continuous and ongoing for approximately 360 days. Despite the severe and foreseeable real-world danger and medical distress caused to the Plaintiff, the Defendant has consciously and willfully refused to take down, delete, or retract the defamatory publications, demonstrating actual malice and a conscious disregard for the Plaintiff's life, safety, and well-being.

VI PRAYER FOR RELIEF

WHEREFORE, Plaintiff, COL Junel Jeffrey, respectfully requests that this Court enter judgment in her favor and against Defendant, Dr. Charles M. Spears, and award the following relief:

- a. Compensatory damages for ongoing professional and emotional harm in an amount to be determined at trial, but not less than \$1.8 million (Count I).
- b. Compensatory, special, and general damages in an amount to be determined at trial, but no less than \$10 million (Count II) to reimburse out-of-pocket law enforcement, data security, and medical costs, and to compensate for severe emotional distress, pain, suffering, and loss of peace of mind,

- c Punitive damages in the amount of \$25 million, to punish the Defendant for his malicious, willful, reckless conduct and to deter others from engaging in similar internet-based harassment campaigns, and personal harm,
- d A permanent TRO preliminary and injunction ordering the Defendant to immediately and permanently delete all defamatory publications from X/Twitter, LinkedIn, and RedState, and restraining the Defendant from publishing any further written or verbal statements concerning the Plaintiff,
- e An award of reasonable attorneys' fees, expert witness fees, and all litigation costs incurred herein, and
- f Such other and further relief as this Court deems just, equitable, and proper

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable

Dated September 10, 2026

Respectfully submitted,



Junel Jeffrey

Plaintiff, pro se

Washington, DC

202- / @



Superior Court of the District of Columbia

CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N W , Suite 5000 Washington, D C 20001

Telephone (202) 879-1133 Website www.dccourts.gov

Junel Jeffrey

Plaintiff

vs

2026 6380

Case Number

Charles M Spears (also known as "Dr Chase Spears")

Defendant

SUMMONS

To the above named Defendant

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N W , between 8 30 a m and 5 00 p m , Mondays through Fridays or between 9 00 a m and 12 00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Junel Jeffrey, pro se

Name of Plaintiff's Attorney

[REDACTED] Washington DC [REDACTED]

Address

202- [REDACTED]

Telephone

如需翻译 请拨打 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có mặt bản dịch, hãy gọi (202) 879-4828

번역을 원하시면 (202) 879-4828로 전화하십시오. (202) 879-4828 로 전화

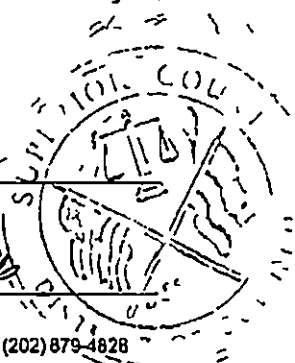
Clerk of the Court

By

Deputy Clerk

Date

9/10/2024



IMPORTANT IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202 628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue N W , for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL**

Sección de Acciones Civiles
500 Indiana Avenue, N W, Suite 5000, Washington, D C 20001
Telefono (202) 879-1133 Sitio web www.dccourts.gov

Junel Jeffrey

Demandante

contra

2026 6380
Numero de Caso

Charles M Spears (also known as "Dr Chase Spears")

Demandado

CITATORIO

Al susodicho Demandado

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiun (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N W, entre las 8 30 a m y 5 00 p m, de lunes a viernes o entre las 9 00 a m y las 12 00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podrá dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Junel Jeffrey, pro se

Nombre del abogado del Demandante

Washington, DC

Dirección

202
Telefono

如電話請打電話 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Đã có một bản dịch, hãy gọi (202) 879-4828

電話 (202) 879-4828 或傳真 (202) 879-4828

የስልክ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

SECRETARIO DEL TRIBUNAL

Por

Subsecretario

Fecha

IMPORTANTE SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO

Si desea conversar con un abogado y le parece que no puede pagarle a uno llame pronto a una de nuestras oficinas del Legal Aid Society (202-628 1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N W para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
See reverse side for English original

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

2026 6300

Junel Jeffrey
 Plaintiff(s)

Case Number

vs

Date

Charles M. Spears
 Defendant(s)

☐ One of the defendants is being sued
 in their official capacity

Name (Please Print) <u>Junel Jeffrey</u>		Relationship to Lawsuit ☐ Attorney for Plaintiff ☒ Self (Pro Se) ☐ Other _____
Firm Name <u>Pro Se</u>		
Telephone No <u>202-462-1111</u>	DC Bar No <u>202-462-1111</u>	

 TYPE OF CASE ☐ Non Jury ☐ 6 Person Jury ☐ 12 Person Jury
 Demand \$ _____ Other _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No _____ Judge _____ Calendar # _____

Case No _____ Judge _____ Calendar # _____

NATURE OF SUIT (Check One Box Only)		
CONTRACT ☐ Breach of Contract ☐ Breach of Warranty ☐ Condominium/Owner Assn. Fees ☐ Contract Enforcement ☐ Negotiable Instrument	COLLECTION/INS. SUB. ☐ Debt Collection ☐ Insurance Subrogation ☐ Motion/Application for Judgment by Confession ☐ Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE ☐ Breach of Contract ☐ Discrimination ☐ Wage Claim ☐ Whistle Blower ☐ Wrongful Termination
REAL PROPERTY ☐ Condominium/Owner Assn. Foreclosure ☐ Declaratory Judgment ☐ Drug Related Nuisance Abatement	☐ Ejectment ☐ Eminent Domain ☐ Interpleader	☐ Other ☐ Quiet Title ☐ Specific Performance
ADMINISTRATIVE PROCEEDINGS ☐ Administrative Search Warrant ☐ Application for Entry of Jgt. Defaulted Compensation Benefits ☐ Inter Administrative Order as Judgment ☐ Label of Information ☐ Master Meter ☐ Petition Other		AGENCY APPEAL ☐ Dangerous Animal Determination ☐ DCPS Residency Appeal ☐ Merit Personnel Act (OIA) ☐ Merit Personnel Act (OHR) ☐ Other Agency Appeal
MALPRACTICE ☐ Medical - Other ☐ Wrongful Death		☐ FRIENDLY SUIT ☐ HOUSING CODE REGULATIONS ☐ QUI TAM ☐ STRUCTURED SETTLEMENTS
☐ APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT		

Information Sheet, Continued

CIVIL ASSET FORFEITURE ☐ Currency ☐ Other ☐ Real Property ☐ Vehicle		TORT ☐ Abuse of Process ☐ Assault/Battery ☐ Conversion ☐ False Arrest/Malicious Prosecution ☒ Libel/Slander/Defamation ☐ Personal Injury ☐ Toxic Mass ☐ Wrongful Death (Non Medical Malpractice)	
NAME CHANGE/VITAL RECORD AMENDMENT ☐ Birth Certificate Amendment ☐ Death Certificate Amendment ☐ Gender Amendment ☐ Name Change			
GENERAL CIVIL ☐ Accounting ☐ Deceit (Misrepresentation) ☐ Fraud ☐ Invasion of Privacy ☐ Lead Paint ☐ Legal Malpractice ☐ Motion/Application Regarding Arbitration Award ☐ Other - General Civil		☐ Product Liability ☐ Request for Liquidation ☐ Writ of Replevin ☐ Wrongful Eviction CIVIL IS/COMPLEX CIVIL ☐ Asbestos MORTGAGE FORECLOSURE ☐ Non-Residential ☐ Residential	
		STATUTORY CLAIM ☐ Anti-SLAPP ☐ Consumer Protection Act ☐ Exploitation of Vulnerable Adult ☐ Freedom of Information Act (FOIA) ☐ Other TAX SALE FORECLOSURE ☐ Tax Sale Annul ☐ Tax Sale Bid Off	
VEHICLE ☐ Personal Injury ☐ Property Damage		☐ TRAFFIC ADJUDICATION APPEAL ☐ REQUEST FOR FOREIGN JUDGMENT	


 Filer/Attorney's Signature

10 September 2026
 Date