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COURT OF APPEALS
DIVISION ONE
FEB - 8 2016

No. 73515-2-1

IN THE COURT OF APPEALS DIVISION ONE
STATE OF WASHINGTON

FENTAHUN AMARE, Appellant

Vs.

WASHINGTON ACCESSIBLE TRANSPORTATION, LLC, (WAT)

Mohamed Mohamud, et al.

WASHINGTON ACCESSIBLE TAXI ASSOCIATION, LLC (WAT)

Sharawe, Mohamud, et al. Respondents.

73515-2-1
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APPELLANT'S BRIEF

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A. ASSIGNMENT OF ERROR

1. The Court erred by failing to rule that the action of an individual by name Amin Bouanani who had neither the authority nor the authorization to dissolve WAT, a successful company partly owned by Appellant was illegal and unlawful.
2. The Court erred by failing to rule that Respondent Mohamed Mohamud forming Washington Accessible Transportation LLC, which he deceptively referred to as WAT to replace Washington Accessible Taxis LLC, a company partly owned by Appellant, while he was an employee of Washington Accessible Taxis LLC was illegal and unlawful.
3. The Court erred by failing to rule that Respondent Omar Hussein who formed Washington Accessible Taxi Associates LLC, which he deceptively referred to as WAT, a company the Appellant partly owned, in the winning RFP that establishment of that business was illegal and unlawful.
4. The Court erred by failing to rule that Respondent Mohamud Sharawe, an accomplice to Respondent Hussein falsified declaration and testimony under oath that he obtained license directly from the City and County was a perjury with intent to obstruct justice illegal and unlawful.
5. The Court erred by failing to rule that Christopher Van Dyk who facilitated and conspired to dissolve WAT committed perjury and fraud against Appellant and L & I was unfit to give sworn testimony.

B. ISSUES PERTAINING TO ASSIGNMENT OF ERRORS

1. Amin M, Bouanani never held any sole official power in the company Washington Accessible Taxi LLC, aka W AT, Records at the Secretary of the State office did not

show Bouanani registered in any capacity, Bouanani dissolved the Washington Accessible Taxis LLC without any authority, authorization, and consent from all members as specified in the Washington Accessible Taxis LLC Agreement. There was no issue that concerned the company let alone close it which Appellant was aware of. However, as it turned out and became known later, Bouanani did not act alone. Respondent Mohamed Mohamud, Respondent Omar Hussein, and their Agent Christopher Van Dyk had conspired to dissolve Washington Accessible Taxis LLC for their sinister motives. Christopher Van Dyke who acted as Agent, Consultant and even as an Attorney to Respondents had interest in dissolving Washington Accessible Taxis LLC. First, there was a desire to avoid the unpaid premium that Washington Accessible Taxis LLC owed L & I in a way to benefit themselves as it turned out to be, Second, there was a motive to dissolve Washington Accessible Taxis LLC in order to replace it with their personal business to make and gain maximum profits for themselves (among close friends). Respondents and Van Dyke had used the resources of Washington Accessible Taxis LLC to advance their own financial gains.

2. Respondent Mohamed Mohamud formed 'Washington Accessible Transportation LLC', which he deceptively referred to as 'WAT' to mimic the legal 'Washington Accessible Taxis LLC, known as WAT'. Respondent deceived Metro Overflow officials through the new Washington Accessible Transportation LLC who were familiar with original WAT for it had accomplished the Pilot Project successfully. Respondent and his accomplices Respondent Hussein and Van Dyk conspired to take over new contracts. Thus, Respondent Mohamud and accomplices used the trade name W AT to deceive and

mislead that his company was the same WAT as contracted with before.

3. Respondent Omar Hussein formed his company, Washington Accessible Taxi Associates LLC, which he also referred to as WAT to deceive and mislead County Officials that his company Washington Accessible Taxi Associates LLC, was the same as Washington Accessible Taxis LLC. Not only the name, but also the business activities were the same as Washington Accessible Taxis LLC providing wheelchair accessible taxi services.
4. Respondent Mohamud Sharawe declared under oath that he obtained his Wheelchair Accessible Taxi license from City of Seattle and King County lottery (infers sale ownership). However, Respondents Hussein declared under oath that Respondent Sharawe was a shareholder of Washington Accessible Taxi Associates LLC, the company he supposedly formed. He confirmed that Sharawe did not obtain his license from the City and County lottery (infers sole ownership) as he claimed. This declaration established the fact that Respondent Hussein had given a share to Sharawe both of which exposed the illegal and unlawful schemes of Respondents (CP 149-150).
5. Christopher Van Dyk wrote emails to the Respondents who were his clients. They were hailing the resolution he achieved avoiding the premium of \$250,000 according to him that Washington Accessible Taxis LLC owed L & I. Van Dyk claimed that L & I was forced to close the account because Washington Accessible Taxis LLC was dissolved. Jubilant Van Dyk asked the group (Respondents) to get together for dinner and celebrate the victory. The statements of Van Dyk were clear evidences of conspiracies that he and Respondents were engaged in a scheme to enrich themselves in illegal manner against the interests of Appellant and L & I.

C. STATEMENT OF THE CASE

1. On 07/03/2006 Appellant Fentahun Amare together with two other individuals named Camel M. Sellam, and Respondent Omar A. Hussein established a company with trade name, Washington Accessible Taxi LLC, also known as WAT. The UBI Number was 602 630 689. Its office was located at 2314 E. Union St. Ste. 203, Seattle, WA 98122 (CP 215). The purpose of the company was to provide wheelchair accessible taxi transportation services. The company had 13 other shareholders, who jointly owned the company.
2. WAT hired Respondent Mohamed Mohamud as an employee. He began working in various capacities. One of his roles was contract manager, but not as a member of Washington Accessible Taxis LLC as stated by Chris Van Dyk under oath in CP 55-57.
3. On 04/23/2010, while an employee of the still existing Washington Accessible Taxis LLC, Respondent Mohamed Mohamud established his own company known as Washington Accessible Transportation, LLC also known as WAT (CP 217). The UBI number of his company is 603011 914. Its address was the same as Washington Accessible Taxi, 2314 E. Union St. Ste. 203, Seattle, WA 98122. (CP 220). The purpose of the company is similar to Washington Accessible Taxi LLC providing wheelchair accessible taxi services.
4. On 07/19/2010 a member of Washington Accessible Taxis LLC by the name Amin M. Bouanani dissolved the Washington Accessible Taxis LLC without the approval or authorization of the Executive Committee or the Shareholders (CP 218). There was no issue to dissolve a successful Company with huge prospect to obtain more contracts.

There was no discussion, decision, resolution, or authorization to dissolve Washington Accessible Taxis LLC. Appellant Amare, a principal partner did not know when the company was dissolved until he filed his first suit.

5. Evidences surfaced proving the fact that Respondents Mohamed Mohamud, Hussein, and other accomplices had interests in dissolving WAT and to take over the business. Later, conflicts among themselves erupted due to financial differences and dishonesty.
6. Washington Accessible Taxi LLC won a contract to provide wheelchair accessible taxi services to the City of Seattle and King County, which ended on 06/30/2010 after 4 1/2 years. Washington Accessible Taxis LLC had fulfilled the services beyond the expectations of the County. The County considered the Pilot Project successful and decided to continue the program on a permanent basis.
7. After the completion of the Pilot Project, the County announced for submittals of Response for Proposal (RFP) to provide wheelchair accessible taxi services. Washington Accessible Taxi LLC was qualified and there was no doubt that it would win the bid. However, Bouanani had dissolved the company.
8. Respondent Hussein filed the RFP for Washington Accessible Taxis Association LLC using the original WAT for qualification, but running the business of his company, Washington Accessible Taxi Association LLC for all transactions. Respondent Hussein defrauded and swindled not only Appellant Amare, but also King County and Secretary of the State.
9. Respondent Bouanani and accomplices dissolved WAT to avoid premium costs that

Washington Accessible Taxis LLC owed L & I. The funds were divided among Respondents and accomplices.

10. Evidence surfaced exposing the unlawful and illegal roles of Christopher Van Dyk who advised Respondents that dissolving Washington Accessible Taxis LLC was the only way to avoid payment of the premium to L & I, which was the only explanation why Bouanani and Respondents dissolved Washington Accessible Taxis LLC.
11. After Bouanani dissolved Washington Accessible Taxis LLC, Christopher Van Dyk stated that L & I closed the account on Washington Accessible Taxis LLC because they were unable to pursue a business that was dissolved. Doing so was one of Van Dyk's promises to Respondents.
12. Even though Washington Accessible Taxis LLC hired Van Dyke, he switched his allegiance to one group and sided with Respondents stating that he could not represent those associated with Washington Accessible Taxis LLC. Not only did Van Dyk warn that he would protect and defend Respondents in the Court of Law against those who sue them, and he did exactly as he said, defend them in court testifying, as it was falsely against Appellant.
13. The group that Respondent Mohamed Mohamud selected to work with him were family relatives and close friends; Appellant was an outsider, and seen as unfit to their family business. Eventually, differences among themselves erupted, and Respondent Omar Hussein split from Washington Accessible Transportation LLC and established his own company with the trade name Washington Accessible Taxis Association LLC often

referred to as WAT. It had the same address and same business activities as Washington Accessible Taxis LLC. Its business was to provide wheelchair accessible taxi services. In a document labeled "Confidential", Respondent Hussein stated that he formed his company Washington Accessible Taxi Associates LLC on 07/03/2006, which was the date Washington Accessible Taxis LLC was established. Based on these false statements and claims, Hussein was able to secure permanent licenses from King County that Appellant is at least partially entitled to since his company was referred to in the winning RFP countless number of times.

14. Respondent Hussein tried to appease Appellant by offering him a share in the new company as seen in the last sentence of CP 149-150. However, he had already dispersed the shares of his company to his friends and relatives, as did Respondent Mohamed Mohamud. Respondent Hussein told Appellant that Respondent Mohamud W. Sharawe had illegally possessed a share that belonged to Appellant. Respondent Sharawe had claimed that he obtained the license directly from City of Seattle and King County by lottery (infers sale ownership), CP 110. Believing that Respondent Sharawe stole the license, Appellant included Sharawe in the lawsuit. CP 109-110 shows that Respondent Sharawe did not obtain license directly from the city or King County by lottery (infers sale ownership) but through the RFP won by Washington Accessible Taxis Associates LLC. Respondent Hussein gave the share to him. His sworn testimony was thus false as was that of Respondent Sharawe.
15. When Appellant Amare filed lawsuit, Respondents Hussein wanted to settle to settle the problem.

16. Respondent Hussein made declarations under oath. He implicated himself admitting his unlawful action. However, after he retained an Attorney, he changed his stories. He could not erase the public records, which showed his criminal activities as described above. The matter that they prevailed in Court is due to ambiguity of the business due to names and its transfer or assets.

D. STATEMENT OF FACTS

1. On 07/03/2006, Appellant Fentahun Amare, and two other individuals, by name Camel M. Sellam, and Omar A. Hussein established a company with a tradename of Washington Accessible Taxi LLC (WAT). Its UBI number was 602 630 689. Appellant Amare was the contact person. Sellam was the agent, and Respondent Omar A. Hussein was the third signatory, CP 217.
2. The company had sixteen partners that included Respondent Hussein, and Amin M. Bouanani. Respondent Mohamed Mohamud was not a member. He was an employee. The purpose of the company was to provide wheelchair accessible taxi services. The office of the company was located at 2314 E. Union Sl. Ste. 203, Seattle, WA 98122. WAT hired Respondent Mohamed Mohamud as an employee and began working in various capacities including contract manager, but not as a member of Washington Accessible Taxis LLC as stated by Mr. Van Dyk under oath in CP 55-57.
3. On 04/23/2010 as an employee of Washington Accessible Taxis LLC Respondent Mohamed Mohamud established his own company, CP 217, with a trade name Washington Accessible Transportation LLC, also known as WAT. Its UBI number is 603 011 914. Its services were the same, providing wheelchair accessible taxi, and its office address was

the same as Washington Accessible Taxi LLC, CP 220.

4. On 07/19/2010, Amin M. Bouanani dissolved a successful company without Board approval and knowledge of its members, CP 218.
5. Respondent Mohamed Mohamud quietly ran his business concealing all facts including the existence of his company. He gave the impression that it was Washington Accessible Taxis LLC. However, Respondent was in the process of transferring the bank accounts of Washington Accessible Taxis LLC to his new company. Since the abbreviation "WAT" and the address were the same, no one suspected the stealth scheme he was running. There is a manager from Metro Overflow who is willing to testify.
6. Respondent Mohamed Mohamud established the same kind of company to do the same kind of business. He did so while he was still an employee of Washington Accessible Taxis LLC, and was able to use all of its resources.
7. The fact that Respondent Mohamed Mohamud referred to his new company Washington Accessible Transportation as WAT, similar to Washington Accessible Taxis LLC, he was able to confuse and conceal his schemes and mislead the officials including members of the company. After Respondent completed the schemes and transferred all the resources into his company, the coconspirator, Amin Bouanani, dissolved Washington Accessible Taxis LLC.
8. Respondents Mohamed Mohamud, Hussein, and Sharawe may have ties or other relationships. Most if not all are from the same nationalities. Appellant has a different nationality, which they found inconvenient. When Appellant formed the company he welcomed anyone.

9. Amin Bouanani, one of the main conspirators without any sole authority or instructions from the officials, dissolved Washington Accessible Taxis LLC. After dissolving the company, he wrote a letter and gave it to the Appellant.
10. Appellant was not aware of the dissolution of Washington Accessible Taxis LLC, and he did not believe it because Washington Accessible Taxis LLC according to him was operating. The letter stated:

To Whom It May Concern

This is to inform you that as of June 30th, 2010, the contract with King County had expired, and Fantahun Amare who has been a full member of W AT operating since September 2006 is without a job altogether with 15 other WAT drivers.

11. However, in the mind of every one, Washington Accessible Taxis LLC was operating and the letter meant nothing other than animosity against Appellant Amare at the time. Washington Accessible Taxis LLC had completed the Pilot Project on June 30, 2010. The Pilot Project was a big success, and King County had expressed its plan to continue the project permanently.
12. The conspirators had realized the potential and prospect of business opportunity in the wheelchair accessible taxi services, which was why they wanted to establish a family business by purging the Appellant.
13. Respondent Hussein filed a RFP 1036-10- RFP, a Proposal to King County for an LLC titled Washington Accessible Taxi Association, and he deceptively presented information from past Washington Accessible Taxis LLC operations CP 45:

"2010 DRAFT REVISION: CONFIDENTIAL:

V. FORMATION OF THE COMPANY

Formation: The Company was formed on July 3, 2006. When the Certificate of

Formation was executed and filed with the office of the Secretary of State in accordance with the Act.

Name: The name of the Company is "Washington Accessible Taxis Associates, LLC.

Principal Place of Business: The principal place of business of the Company: 2314 Union Street, Suite 203
Seattle, Washington 98122.

Registered Agent: The Company's registered agent and its contact information is: Omar A. Hussein, 23 14 East Union Street, Suite 203 Seattle, Washington 98122”

14. Respondent Hussein did not establish his company, Washington Accessible Taxis Associates LLC on 07/03/2006 as he falsely claimed. The company established on 07/03/2006 was Washington Accessible Taxi per Secretary of the State's record, CP 215.

E. SUMMARY OF ARGUMENTS

1. Appellant Amare was one of the principal officers who formed WAT that served the County starting from its inception until it was illegally dissolved.
2. Respondent Mohamed Mohamud, a non-partner who was an employee of WAT formed his own company with the trade name, Washington Accessible Transportation LLC that was clearly a conflict of interest and in violation of the law.
3. Respondent Mohamed Mohamud had unlawfully transferred everything including the bank account of WAT to his new company which he referred to as WAT.
4. Amin Bouanani, a close friend of Respondent Mohamed Mohamud, dissolved WAT illegally and unlawfully. WAT retained Christopher Van Dyk to serve as a Consultant /Agent. After Bouanani dissolved Washington Accessible Taxis LLC, Van Dyk carried out unethical business practices that financially destroyed Appellant, harmed government agencies such as L & I, and obstructed justice.
5. Respondent Omar A. Hussein formed his new company, but falsified that his company

was Washington Accessible Taxis LLC formed on 07/03/2006 to get the contract from King County.

6. Respondent Mohamud W. Sharawe got a share from Respondent Hussein. However, Respondent Sharawe denied and obstructed justice by testifying under oath in a declaration that he had nothing to do with the company of Respondent Hussein.

F. ARGUMENT

1. Respondent Mohamed Mohamud formed a company with a similar trade name, similar business activities, and address of original WAT. His action violated RCW 19.77.020 and RCW25.15.010 among other laws and regulations.
2. Respondent Mohamed Mohamud formed a company with similar trade name, similar business activities, and same address as Washington Accessible Taxis LLC His declaration states otherwise. Yet, CP 220 shows the same address as Washington Accessible Taxis LLC The witness from Metro Overflow will state transactions with Washington Accessible Transportation, LLC as WAT as Pro Se, Appellant did not have access to records of Washington Accessible Transportation LLC The judge should have considered this material fact that a witness would clarify as reason for rejection of dismissal of Washington Accessible Transportation LLC in the case. This will illuminate the names used by Washington Accessible Transportation to gain contracts which will highlight the fraud and use of the name WAT in violation of RCW25.15.010 & RCW 9A.60.020- Forgery. His action violates RCW25.15.010 (3)(d) Name set forth in certificate of formation):

(3) A name shall not be considered distinguishable upon the records of the secretary of state by virtue of:

(a) A variation in any of the following designations for the same name: "Corporation," "incorporated," "company," "limited," "partnership," "limited partnership," "limited liability company," or "limited liability partnership," or the abbreviations "corp.," "inc.," "co.," "ltd.," "LP," "L.P.," "LLP," "L.L.P.," "LLC," or "L.L.C";

(b) The addition or deletion of an article or conjunction such as "the" or "and" from the same name;

(c) Punctuation, capitalization, or special characters or symbols in the same name; or

(d) Use of abbreviation or the plural form of a word in the same name.

3. Respondents Mohamed Mohamud, Hussein, Sharawe, and conspirators Amin Bouanani and Christopher Van Dyke dissolved the company for the purposes of enriching themselves in violation of RCW 9A.28.040.
4. Christopher Van Dyk, who was no friend to justice sent emails that contained disparaging remarks about the justice and legal system, while himself appearing like an angel to mask his unlawful and illegal activities hindering and obstructing justices and advancing illegal activities.
5. Christopher Van Dyke answered to the complaint on behalf of the two companies as a pro se. This is illegal because he is not representing himself or his own assets, but someone else. He signed the document as Pro Se Defendant CP226-228. Since he is not a lawyer, he has illegally practiced law in the State of Washington.
6. Also, in the email in CP 229-231, Van Dyk refers to the dissolved company as Washington Accessible Transportation a couple of times and explicitly in one situation. This portrays that it is hard to distinguish the three companies, even among those who are partly involved in the companies.

7. Thirdly, in his declaration, Van Dyk states that the Washington Accessible Taxis Association LLC had a business license that could expire in 2011 legally. Yet, the RFP states the Primary Driver Requirement is:

The primary drivers must all affiliate with the same taxicab association licensed by the City of Seattle for five (5) consecutive years following the insurance of the WAT licenses,” CP 41.

8. Washington Accessible Taxis Association LLC was created in 2010. Thus, they could not discontinue the LLC unless Christopher Van Dyk was referring to LLC Washington Accessible Taxis formed in 2006.

9. The last example from his declaration highlights the ambiguity of the LLCs and the assets associated with them. So, if the Washington Accessible Taxi Association LLC is not Washington Accessible Taxi LLC, then the contract is void and the permanent licenses will be revoked. If not, then Washington Accessible Taxi Association LLC is Washington Accessible Taxi LLC, and Appellant is entitled to some of the assets associated with Washington Accessible Taxi Association LLC which are the permanent licenses.

10. Respondent Hussein broke the law and regulations and submitted falsified documents in violation of RCW 9A.28.040, RCW 9A.60.020, RCW 9A.60.050, RCW 9A.60.040 (Criminal Impersonation in the First Degree) and RCW 18.130.200.

11. Respondent Hussein broke the laws RCW 9A.60.020 (Fraud), RCW 18.130.200 (Misrepresentation in Obtaining a License), and RCW 25.15.010 (Name of Company). Respondent Hussein violates all three laws simultaneously to gain the new permanent licenses Appellant worked hard for as seen in CP 225 and in this excerpt from the RFP stating:

1. Executive Summary:

Washington Accessible Taxis Associates, LLC (WAT) is singularly well-qualified to fulfill the needs of customers in the City of Seattle and in King County who require wheelchair accessible taxis. WAT was the sole organization to receive temporary wheelchair accessible dual licenses (refers to Washington Accessible Taxis LLC in the City of Seattle and King County Wheelchair Accessible Taxicab Demonstration Project began its operations in September 2006 (refers to Washington Accessible Taxis LLC).

12. The Attorney for Respondents even though he has indisputable legal duty and obligations to defend his clients, his actions to obscure and conceal unlawful and criminal activities that his clients committed against Appellant, State Agencies and King County were the call of his duty. The Court had the following incriminating document from Mohamud Sharawe, and used it as an instrument to obstruct justice as the Attorney submitted it and was before it:

I was awarded by King County a license to drive a wheelchair accessible cab in March 2011. A copy of the award letter is attached to the motion for summary judgment and labeled exhibit A. After I was awarded the license, I purchased an appropriate vehicle and all the equipment necessary to operate a wheelchair accessible cab. No one else contributed any money or anything else of value towards this.

13. The declaration of Respondent Mohamed Mohamud made under oath was also a clear violation of the law, and it was before the court, CP 55-57. The testimony of Respondent Hussein, Elias Shifaw, and Tadesse Assefa made under oath were also before the Court and reads in CP 49-50.
14. Respondent Sharawe obtained his license through the RFP, not through the lottery (infers sole ownership) as seen in CP 91-92. The RFP explicitly states that the LLC will use a dual license system by the authors of the RFP. Thus his declaration that stated he

obtained his license from the lottery is false. Also, his declaration that he is the sole owner of the license with respect to the RFP is also false due to the dual license system stated in the RFP by Washington Accessible Taxis Association LLC. Therefore, he committed Perjury in the first degree (RCW 9A.72.020). Also, he falsely swore (RCW 9A.72.040).

15. Bouanani dissolved Washington Accessible Taxis LLC in violation of RCW 25.15.270. Respondent Hussein formed his company in violation of RCW 19.77.020, RCW 19.77.130, RCW 18.130.200, RCW 25.15.010, and RCW 25.15.270. These damning facts implicating Respondents in every action they did were before the Court while dismissing the case on the basis that it lacked material facts to prove Respondents committed wrong doing that harmed Appellant.
16. Bouanani dissolved WAT in violation of RCW 25.15.270 which is Dissolution and the Washington Accessible Taxis LLC Agreement. The requirements for dissolution of this law and the law references in the requirements of this law are unsatisfied:
17. A limited liability company is dissolved and its affairs shall be wound up upon the first to occur of the following:
 - (1) (a) The dissolution date, if any, specified in the certificate of formation. If a dissolution date is not specified in the certificate of formation, the limited liability company's existence will continue until the first to occur of the events described in subsections (2) through (6) of this section. If a dissolution date is specified in the certificate of formation, the certificate of formation may be amended and the existence of the limited liability company may be extended by vote of all the members.
 - (b) This subsection does not apply to a limited liability company formed under RCW 30.08.025 or 32.08.025;
 - (2) The happening of events specified in a limited liability company agreement;
 - (3) The written consent of all members;
 - (4) Unless the limited liability company agreement provides otherwise, ninety

days following an event of dissociation of the last remaining member, unless those having the rights of assignees in the limited liability company under RCW 25.15.130(1) have, by the ninetieth day, voted to admit one or more members, voting as though they were members, and in the manner set forth in RCW 25.15.120 (1); (5) The entry of a decree of judicial dissolution under RCW 25.15.275;

or

The administrative dissolution of the limited liability company by the secretary of state under RCW 25.15.285(2), unless the limited liability company is reinstated by the secretary of state under RCW 25.15.290.

Also, in CP 218 in section 3, the stated reason for dissolution was:

"Washington Accessible Taxis Pilot Project Terminated Officially on June 30th 2010."

18. Bouanani's reason does not satisfy a legal requirement to dissolve Washington Accessible Taxis LLC. He did not obtain the written vote of members of Washington Accessible Taxis LLC nor did the group decide on a specific day to terminate the LLC in accordance with RCW 25.15.270- Dissolution. The proof is in the fact that Appellant claims he did not vote.

G. CONCLUSION

- 1) Plenty of ambiguities exist that the Lower Courts did not catch due to the well planned scheme of Washington Accessible Taxis LLC assets transfers. Also, as a pro se appellant trying to uncover illegally transferred assets. Appellant has little access to other documents that can serve as evidence. However, the evidence presented by a pro se is enough material fact to reject the dismissal. The Lower Court stood against him and failed to serve justice. The Court ruled in favor of Respondents who admitted their own wrong doings and testified against each other. The Lower Court ruled in favor of Respondents, not in the interest of justice and law. The exhibits Appellant presented are

unchallengeable by any factor circumstances. Three companies could not exist having the same abbreviation, same business services, and even the same address. The Court literally made these unlawful activities lawful. The Court had made all proofs as not good enough to convince the Court.

- 2) Respondents broke the laws and regulations of the State, county, and city and took over Appellant's legal business to enrich themselves. The evidences and proofs filed in Court prove these allegations.
- 3) This Court will find that the Lower Court failed repeatedly to render justice in accordance to facts and evidences presented, and given the fact that Appellant / Plaintiff who represented himself needed and deserved the close attention of the Court to prevent and stop the clever manipulations of events and misinterpretation of the facts by the lawyer of the opposing party. To the contrary, the Judge acted in manner that favored of Respondents/Defenders and gave credence to the falsified testimonies, and declaration, which were made under oath that proved to be false. The Court ignored the following facts that were presented in manners that the Court could have never missed:
 - a) Amin Bouanani who had no legal authority or authorization to dissolve Washington Accessible Taxis LLC, a criminal act.
 - b) Respondent Mohamed Mohamud established a Company that competed with Washington Accessible Taxis LLC while he was working for them at the time he formed the company with the same function and the same location.
 - c) Respondent Omar Hussein claimed that he formed a company whose name and activities resembled the company that Appellant is involved in and is stated to be

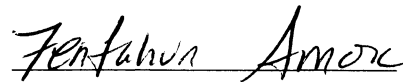
the same company in the winning RFP.

- d) Respondent Mohamud Sharawe committed perjury testifying falsely to the Court under oath that his assets were not related to mv illegally taken assets or investments at all.
- e) Christopher Van Dyk conspired to avoid fees Washington Accessible Taxis LLC owed to L & I by closing down W AT. His roles in obtaining contracts for Defendants unlawfully, and his roles obstructing justice in the court were significant. In spite of these evidences and proofs, for whatever wisdom, the Court was bent to rule against Appellant, CP 226-228.

Appellant prays that this Court render justice based on the illumination of the issues, and facts and evidences presented to prove them. Appellant prays that the Court award him restitutions he deserves and the laws permit. He prays that the Court rule and order Respondents to end their unlawful activities, and restore the legal operations of the real and legitimate company, Washington Accessible Taxi, LLC (WAT).

Appellant prays that the Court award him \$ 350,000 to compensate him for the financial losses he has suffered for nearly five years, and continue to suffer, plus an amount that the laws allows for pain and suffering Appellant has suffered, and any other award that the Court deems fair and just.

Dated this 8th day of February 2016.



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IN THE COURT OF APPEALS DIVISION ONE

STATE OF WASHINGTON

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FENTAHUN AMARE, Appellant

Vs.

WASHINGTON ACCESSIBLE TRANSPORTATION,
LLC, (WAT). Mohamed Mohamud, et al.
WASHINGTON ACCESSIBLE TAXI ASSOCIATION,
LLC (WAT) Sharawe, Mohamud, et al. Respondents.

No. 73515-2-1

PROOF OF SERVICES

I, Fentahun Amare, hereby declare under penalty of perjury under the laws of the state of Washington, that on the 8th of February, 2016, I mailed a copy of the BRIEF OF APPELLANT filed in court on the opposing parties' Attorney at his address shown below, via the selected service listed below. Copy of proof is attached herewith.

faxed; and/or

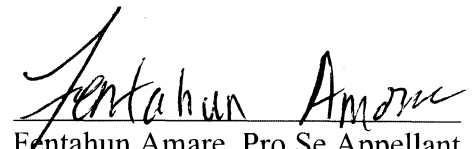
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sent via ABC Legal Messengers, Inc.

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Seattle, WA 98117-4449

Dated this 8th day of February, 2016.


Fentahun Amare, Pro Se Appellant
2026 S. Main St. #3
Seattle, WA 98144
Phone: (206) 249-1582

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February 9, 2016 , 7:15 am	Departed USPS Facility	SEATTLE, WA 98168
February 8, 2016 , 10:28 pm	Arrived at USPS Facility	SEATTLE, WA 98168

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