

**IN MARYLAND:**

**THE CIRCUIT COURT FOR PRINCE  
GEORGE'S COUNTY**

AMERICAN ACCOUNTABILITY  
FOUNDATION,

[REDACTED]

Plaintiff,

v.

TOWN OF CHEVERLY, MD,

[REDACTED]

Defendant.

Civil Case No.  
C-16-CV-26-004015

**COMPLAINT**

This is a lawsuit seeking to enforce the right to inspect and copy public records pursuant to the Maryland Public Information Act, Md. Code Ann., State Gov't § 10-611 *et seq.* Plaintiff, American Accountability Foundation (“AAF”), a non-profit organization, requested public records from Defendant, Town of Cheverly, Maryland (“Defendant Cheverly”), relevant to the town’s Supplemental Voter Registry and non-citizen voting provision. Disclosure of the requested records is of great importance and interest to the public, as there have been examples of voter fraud throughout Prince George’s County regarding non-citizens voting.

Through its reporting, AAF seeks to inform the public about whether Cheverly is facilitating illegal voting. Regrettably, Defendant Cheverly has met AAF’s requests for

data with delay and a lack of responsiveness.

Fully eight months after AAF first requested the public records necessary for its reporting, Defendant Cheverly continues without lawful justification to withhold records subject to timely production under the Maryland Public Information Act (“MPIA”). It continues to do so even after AAF’s attempts to follow up on the request. This Court’s intervention, and the sanction of an award of attorney fees and costs, are consequently required.

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to Md. Code Ann., State Gov’t § 10-623(a) because the public record is located within the county.

### **PARTIES**

2. Plaintiff American Accountability Foundation is an educational non-profit organization that conducts nonpartisan research and factchecking.

3. Defendant Town of Cheverly is a Maryland municipal corporation for purposes of Maryland Public Information Act, Md. Code Ann., State Gov’t § 10-611(j)(2).

4. Defendant Cheverly is the legal custodian of the public records at issue in this lawsuit.

5. Defendant Cheverly maintains its primary place of business at 6401 Forest Road, Cheverly, MD 20785, is located in Prince George County, Maryland, and is subject to service of process in Prince George County.

## **FACTUAL ALLEGATIONS**

6. Defendant Cheverly is a town in the State of Maryland, and as such, is governed by the public disclosure requirements of the Maryland Public Information Act, Md. Code Ann., State Gov't § 10-611, *et seq.*

7. On October 17, 2025, Plaintiff AAF submitted a written MPIA request to Defendant Cheverly seeking disclosure of public records. *See* Pl.'s MPIA Request to Cheverly (October 17, 2025), Ex. A. (Hereinafter MPIA Request).

8. Defendant Cheverly responded on October 20, 2025, stating that it may take more than ten days to produce the requested records and that a fee may be required. *See* Def.'s MPIA Response (October 20, 2025), Ex. B. (Hereinafter MPIA Response).

9. On October 22, 2025, Defendant Cheverly forwarded its response to AAF. *See* Def.'s MPIA Forwarded Email (October 22, 2025), Ex. C.

10. By electronic mail on October 22, 2025, AAF reiterated to Defendant Cheverly the request for a waiver of fees due to public interest in the issue and the AAF's role as a news gathering organization. *See* Pl.'s October 22 Email, (October 22, 2025), Ex. D.

11. On June 24, 2026, AAF requested a status update on the pending MPIA Request. *See* Pl.'s Update Request, (June 24, 2026), Ex. E.

## **COUNT I**

### **Violation of the Maryland Public Information Act (MPIA)**

12. The allegations set forth in the forgoing paragraphs are incorporated herein by reference.

13. The Maryland Public Information Act, Md. Code Ann, State Gov't § 10-612, states that “[a]ll persons are entitled to have access to information about the affairs of government and the official acts of public officials and employees.”

14. The MPIA provides that, “a custodian shall permit a person or governmental unit to inspect any public record at any reasonable time,” Md. Code Ann, State Gov’t § 10-613(a)(1), and that, “[t]he custodian shall grant or deny the application promptly, but not to exceed 30 days after receiving the application.” Md. Code Ann, State Gov’t § 10-615(b).

15. Defendant Cheverly possesses records responsive to Plaintiff AAF’s MPIA Request (Ex. A).

16. Defendant Cheverly has provided no records responsive to AAF’s MPIA Request and has identified no future date for the production of any records.

17. Approximately eight months have elapsed since the date of the request by AAF to Defendant Cheverly.

18. In refusing to timely produce the records, Defendant Cheverly has not relied on or asserted any exemptions from disclosure pursuant to Md. Code. Ann., State Gov't § 10-616-617. Under principles of equity, Defendant has waived and should be barred from any such assertion.

19. Defendant Cheverly has not responded in any way to AAF’s request for an update. Pl.’s Update Request. Ex. E.

20. Defendant Cheverly has provided no documents in response to AAF’s MPIA Request (Ex. A).

21. Defendant Cheverly has not responded to AAF's request for a fee waiver. Under principles of equity, Defendant has waived its opportunity to do so and should be barred therefrom.

22. By its refusal to provide timely compliance with the MPIA, and its continuing willful refusal to provide documents responsive to AAF's request, Defendant Cheverly has violated the Maryland Public Information Act, Md. Code Ann., State Gov't § 10-611 *et seq.*



**REQUEST FOR ISSUANCE OF WRIT OF SUMMONS**

Plaintiff, by counsel, respectfully requests that the Clerk of the Court issue a Writ of Summons for service upon the Defendant in this action in accordance with the Maryland Rules.

Dated: July 8, 2026.

Respectfully submitted,

/s/ Liam R. Harrell  
LIAM R. HARRELL

