

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH INFORMATION SHEET

District of Columbia Case Number: _____

vs Date: February 2, 2018

Sanford Capital, LLC , et al. One of the defendants is being sued
in their official capacity.

Name: <i>(Please Print)</i> <u>Stephon Woods</u>		Relationship to Lawsuit
Firm Name: <u>D.C. Office of the Attorney General Housing and Community Justice</u>		<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: <u>(202) 724-5319</u>	Six digit Unified Bar No.: <u>1025232</u>	<input type="checkbox"/> Self (Pro Se)
		<input type="checkbox"/> Other: _____

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
Demand: \$ Civil penalties and restitution Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
Case No.: 2016 CA 000162 B Judge: Mott Calendar #: _____

Case No.: 2016 CA 007767 B Judge: Mott Calendar#: _____

NATURE OF SUIT: *(Check One Box Only)*

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|--|--|
| <input type="checkbox"/> 01 Breach of Contract | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied |
| <input type="checkbox"/> 06 Negotiable Instrument | <input type="checkbox"/> 27 Insurance/Subrogation
Over \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 26 Insurance/Subrogation
Over \$25,000 Consent Denied |
| <input type="checkbox"/> 07 Personal Property | <input type="checkbox"/> 07 Insurance/Subrogation
Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 34 Insurance/Subrogation
Under \$25,000 Consent Denied |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 28 Motion to Confirm Arbitration
Award (Collection Cases Only) | |
| <input type="checkbox"/> 15 Special Education Fees | | |

B. PROPERTY TORTS

- | | | |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion | <input type="checkbox"/> 04 Property Damage | |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) | | |

C. PERSONAL TORTS

- | | | |
|---|--|---|
| <input type="checkbox"/> 01 Abuse of Process | <input type="checkbox"/> 10 Invasion of Privacy | <input type="checkbox"/> 17 Personal Injury- (Not Automobile,
Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection | <input type="checkbox"/> 11 Libel and Slander | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice) |
| <input type="checkbox"/> 03 Assault and Battery | <input type="checkbox"/> 12 Malicious Interference | <input type="checkbox"/> 19 Wrongful Eviction |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution | <input type="checkbox"/> 20 Friendly Suit |
| <input checked="" type="checkbox"/> 05 Deceit (Misrepresentation) | <input type="checkbox"/> 14 Malpractice Legal | <input type="checkbox"/> 21 Asbestos |
| <input type="checkbox"/> 06 False Accusation | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts |
| <input type="checkbox"/> 07 False Arrest | <input type="checkbox"/> 16 Negligence- (Not Automobile,
Not Malpractice) | <input type="checkbox"/> 23 Tobacco |
| <input type="checkbox"/> 08 Fraud | | <input type="checkbox"/> 24 Lead Paint |

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA)
(D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 02 Att. Before Judgment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 33 Whistleblower |
| <input type="checkbox"/> 16 Declaratory Judgment | |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code §
2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | <input type="checkbox"/> 20 Master Meter (D.C. Code §
42-3301, et seq.) | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

2/2/2018

Date



**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**

DISTRICT OF COLUMBIA

Plaintiff

vs.

Case Number _____

SANFORD CAPITAL, LLC

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.

STEPHON WOODS

Clerk of the Court

Name of Plaintiff's Attorney

441 4TH STREET, NW, 6TH FLOOR

By _____

Address

Deputy Clerk

WASHINGTON, D.C. 20001

(202) 724 - 5319

Date _____

Telephone

如需翻译,请打电话 (202) 879-4828

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

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

번역을 원하시면, (202) 879-4828로 전화주세요. የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

DISTRICT OF COLUMBIA

Demandante

contra

Número de Caso: _____

SANFORD CAPITAL, LLC

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 veintiún (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, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

STEPHON WOODS

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

441 4TH STREET, NW, 6TH FLOOR

Por: _____

Dirección

WASHINGTON, D.C. 20001

Subsecretario

(202) 724-5319

Fecha _____

Teléfono

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번역을 원하시면 (202) 879-4828 로 전화하십시오

번역 서비스를 받으려면

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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



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CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov**

DISTRICT OF COLUMBIA

Plaintiff

vs.

Case Number _____

315 FRANKLIN, LLC

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.

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STEPHON WOODS

Clerk of the Court

Name of Plaintiff's Attorney

441 4TH STREET, NW, 6TH FLOOR

By _____

Address

Deputy Clerk

WASHINGTON, D.C. 20001

(202) 724 - 5319

Date _____

Telephone

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

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

DISTRICT OF COLUMBIA

Demandante

contra

Número de Caso: _____

315 FRANKLIN, LLC

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 veintiún (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, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

STEPHON WOODS

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

441 4TH STREET, NW, 6TH FLOOR

Por: _____

Dirección

WASHINGTON, D.C. 20001

Subsecretario

(202) 724-5319

Fecha _____

Teléfono

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반영역어번역(202)879-4828 3호번역어번역

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov**

DISTRICT OF COLUMBIA

Plaintiff _____

vs.

Case Number _____

OAKMONT MANAGEMENT GROUP, LLC

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.

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STEPHON WOODS

Clerk of the Court

Name of Plaintiff's Attorney _____

441 4TH STREET, NW, 6TH FLOOR

By _____

Address

Deputy Clerk

WASHINGTON, D.C. 20001

(202) 724 - 5319

Date _____

Telephone

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Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DISTRICT OF COLUMBIA

Demandante

contra

Número de Caso: _____

OAKMONT MANAGEMENT GROUP, LLC

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 veintiún (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.

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STEPHON WOODS
Nombre del abogado del Demandante

SECRETARIO DEL TRIBUNAL

441 4TH STREET, NW, 6TH FLOOR
Dirección
WASHINGTON, D.C. 20001

Por: _____
Subsecretario

(202) 724-5319
Teléfono

Fecha _____

如需翻译, 请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bản dịch, hãy gọi (202) 879-4828
번역이 필요하면 (202) 879-4828로 전화하십시오 የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

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 pedirayuda 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
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov**

DISTRICT OF COLUMBIA

Plaintiff _____

vs.

Case Number _____

AUBREY CARTER NOWELL

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.

STEPHON WOODS

Clerk of the Court

Name of Plaintiff's Attorney _____

441 4TH STREET, NW, 6TH FLOOR

By _____

Address

Deputy Clerk

WASHINGTON, D.C. 20001

(202) 724 - 5319

Date _____

Telephone

如需翻译,请打电话 (202) 879-4828

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

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

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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
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

DISTRICT OF COLUMBIA

_____ Demandante
 contra

Número de Caso: _____

AUBREY CARTER NOWELL
 _____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le require entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (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 require 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, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

STEPHON WOODS
 Nombre del abogado del Demandante

441 4TH STREET, NW, 6TH FLOOR
 Dirección
WASHINGTON, D.C. 20001

(202) 724-5319
 Teléfono

SECRETARIO DEL TRIBUNAL

 Por: _____
 Subsecretario

Fecha _____

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 202-879-4828 202-879-4828 202-879-4828

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IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

DISTRICT OF COLUMBIA
441 4th Street NW
Washington, D.C. 20001

Plaintiff,

v.

SANFORD CAPITAL, LLC
7605 Arlington Road, Suite 250
Bethesda, MD 20814

Serve on: Registered Agent
C T CORPORATION SYSTEM
1015 15th Street, NW, Suite 1000
Washington, DC 20005

and

315 FRANKLIN, LLC
7605 Arlington Road, Suite 250
Bethesda, MD 20814

Serve on: Registered Agent
C T CORPORATION SYSTEM
1015 15th Street, NW, Suite 1000
Washington, DC 20005

and

OAKMONT MANAGEMENT GROUP LLC
7605 Arlington Road, Suite 250
Bethesda, MD 20814

Serve on: Registered Agent
C T CORPORATION SYSTEM
1015 15th Street, NW, Suite 1000
Washington, DC 20005

and

Civ. No. 2018-CA-_____

**COMPLAINT FOR VIOLATIONS OF
THE CONSUMER PROTECTION
PROCEDURES ACT**

JURY TRIAL DEMANDED

AUBREY CARTER NOWELL
In his individual capacity
6807 Bradley Boulevard
Bethesda, MD 20817

Defendants.

**COMPLAINT FOR VIOLATIONS OF THE
CONSUMER PROTECTION PROCEDURES ACT**

The District of Columbia (the “District”) files suit against Defendants Sanford Capital LLC, 315 Franklin LLC, Oakmont Management Group, LLC, and Aubrey Carter Nowell (collectively, “Defendants”) pursuant to the Consumer Protection Procedures Act (“CPPA”), D.C. Code § 28-3901, *et seq.* In support of its Complaint, the District alleges as follows:

INTRODUCTION

1. The District brings this action to address Defendants’ misrepresentations that they would provide safe and habitable housing to the tenants who rented residential units at 315-325 Franklin Street, NE (“the Property”), two four-story multi-family residential apartment buildings with a total of 76 apartments and located in the District of Columbia. From 2012 until the present, Defendants engaged in a pattern of pervasive neglect of the Property, causing tenants to endure vermin and bug infestations, inadequate sanitary, heating and life safety facilities, and other hazardous conditions, including unchecked criminal activity resulting from a lack of basic security measures.

2. When Defendants offered and leased apartments to their tenants, Defendants represented that they would maintain the Property in a habitable condition, including in compliance with the District’s laws and regulations (including the District’s Housing Code). *See, e. g.,* D.C. Reg. 14-3011; *Javins v. First Nat’l Realty Corp.*, 428 F.2d 1071 (D.C. 1970).

Defendants' failure to do so, while continuing to charge and collect rent from tenants, is an unlawful trade practice in violation of the CPPA. To remedy Defendants' violations of the CPPA, provide tenants restitution for past harm, and deter such violations in the future, the District seeks to disgorge rental payments, assess penalties, and collect reasonable fees and costs.

JURISDICTION

3. The Court has subject matter jurisdiction over this matter pursuant to D.C. Code § 11-921 and § 28-3909.

4. The Court has personal jurisdiction over Defendants pursuant to D.C. Code § 13-423.

PARTIES

5. Plaintiff, the District, a municipal corporation that is authorized to sue and be sued, is the local government for the territory constituting the seat of the government for the United States of America. The District brings this action, through its Office of Attorney General, pursuant to the CPPA, D.C. Code § 28-3909, which authorizes the Attorney General to bring court actions to enforce the District's consumer protection laws, including the CPPA.

6. Defendant Sanford Capital, LLC ("Sanford") is a limited liability company organized under the laws of the state of Delaware and maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. Sanford is a residential real estate development and investment firm that owns and operates rental properties in Washington, D.C., including the Property. The Property is held in the name of a separate single-asset LLC under the ownership and control of Sanford and Defendant Aubrey Carter Nowell.

7. Defendant 315 Franklin, LLC ("315 Franklin Street") is a single-asset, limited liability company operating in the District of Columbia organized under the laws of the state of

Delaware. 315 Franklin Street maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. 315 Franklin Street has held legal title to the Property since April 25, 2012. On or about September 13, 2017, 315 Franklin Street filed a Chapter 11 Voluntary Petition with the United States Bankruptcy Court for the District of Columbia. The Bankruptcy Court issued an Order on December 12, 2017 approving a sale of the property. As of the date of this Complaint, a transfer to the new purchaser is imminent.

8. Defendant Oakmont Management Group LLC (“Oakmont”) is a limited liability company organized under the laws of the state of Delaware and maintains a principal place of business at 7605 Arlington Road, Suite 250, Bethesda, MD 20814. Oakmont is responsible for the property management of 315 Franklin Street and acts as the agent for 315 Franklin Street and Sanford.

9. Defendant Nowell is a principal, founder, and managing partner of Sanford, the managing member of 315 Franklin Street, and the managing member of Oakmont. At all times relevant to this Complaint, Nowell formulated, directed, controlled, had the authority to control, participated in, or with knowledge approved of the acts or practices of Sanford, 315 Franklin Street, and Oakmont, including the acts and practices set forth in this Complaint. Nowell resides in Bethesda, Maryland.

FACTS

10. After acquiring the Property in April 2012, Defendants leased units in the Property to tenants through lease agreements. By operation of law, through their lease agreements, and in their dealings with tenants, Defendants represented to tenants, that they would maintain the Property in a safe and habitable condition, in compliance with the District’s Housing Code and other laws and regulations, when in fact they did not. Defendants then collected rent from tenants

without disclosing that Defendants were either unable or unwilling to maintain the Property in a safe and habitable condition, consistent with their obligations under their leases, as well as the District's housing laws and regulations.

Persistent Health, Safety, and Security Issues at the Property

11. During the time that Defendants owned, managed and controlled the Property, and at all times relevant to this Complaint, the Property has been in a serious state of disrepair, and suffered from a multitude of health, safety and security issues, including those described below in paragraphs 12 through 16.

12. During periods relevant to this Complaint, the Property was infested with mice, rats, cockroaches and bedbugs. These infestations presented an unsanitary hazard for the tenants of the Property. Tenants repeatedly and consistently complained to Defendants regarding the rodent and bug infestations. Despite the tenants' repeated complaints, Defendants failed to take measures to abate the infestations.

13. During periods relevant to this Complaint, the Property's plumbing routinely leaked, causing flooding in tenants' units that threatened the tenants' health and safety. Tenants routinely notified Defendants of these leaks. However, Defendants either failed to address these leaks, or only addressed them in a superficial way that failed to fix the source of the leak. This flooding itself presented a hazard and also created additional health hazards such as mold growth.

14. During periods relevant to this Complaint, tenants faced the threat of drug and firearm-related activity at the Property. Loiterers often congregated on the Property in large groups and squatters routinely resided in the Property's vacant units. The vacant units, hallways and parking lots in the property were often used for illicit activities, including the sale and use of drugs and the discharge of firearms. These activities threatened the safety of the Defendants tenants.

Despite being made aware of these safety issues, Defendants failed to implement proper security measures. In fact, during periods relevant to this Complaint, the Property has lacked basic safety measures, such as locks on the Property's front door, adequate lighting in and around the Property, working locks on vacant units, security cameras, and security guards.

15. During periods relevant to this Complaint, Defendants repeatedly failed to clean common areas at the Property, resulting in trash buildup and foul odors.

16. During periods relevant to this Complaint, the Property suffered from unabated fire hazards, including a lack of working fire exit signs, lack of fire extinguishers and inoperable pull stations.

17. Many of the Property's tenants are low-income individuals. These tenants made the difficult decision to continue residing at the Property despite the hazardous and dangerous conditions caused by Defendants' failure to maintain the property because these tenants lacked the means to move to another location

Inspections of Property Confirm Health, Safety, and Security Issues

18. Defendants' failure to maintain the Property free from health, safety and security issues is confirmed by inspections of the Property, which uncovered widespread instances of Housing Code and other violations.

19. For instance, on March 7, 2017, the Department of Consumer and Regulatory Affairs ("DCRA") inspected the Property and cited Defendants for a total of 93 Housing Code violations, 58 of which constituted a serious threat to tenants' health, safety, or security. DCRA also conducted an inspection of the common areas in the 315 Franklin Street NE location of the Property. These violations included failure to maintain electrical panels, failure to provide proper ventilation, defective cooking facilities, failure to eliminate infestations of roaches or other vermin,

and damp ceilings and walls. In May and July of 2017, DCRA returned for re-inspections of the Property and found that Defendants had failed to abate at least 86 of the 93 violations.

20. On December 19, 2017, the D.C. Fire and EMS Department (“FEMS”) conducted a building-wide inspection of the Property. From this inspection, FEMS cited Defendant 315 Franklin Street for 24 fire code violations, including inoperable emergency lights, missing tags and pins on fire extinguishers, malfunctioning pull stations, excessive garbage, missing exit signs in the basement, and loose handrails.

COUNT I
(Violations of the Consumer Protection Procedures Act)

21. The District incorporates by reference paragraphs 1 through 20.

22. The CPPA prohibits unlawful trade practices in connection with the offer, lease and supplying of consumer goods and services. D.C. Code § 28-3901(a)(6). The District may enforce the CPPA in the arena of landlord-tenant relations, such as presented in this case. D.C. Code § 28-3909(d).

23. The tenants in the Property are consumers, as defined by the CPPA, because they rented their units in the Property for personal, household, or family purposes. D.C. Code § 28-3901(a)(2).

24. Defendants, in the ordinary course of business, offer to lease or supply consumer goods and services and, therefore, are merchants under the CPPA. D.C. Code § 28-3901(a)(3).

25. The CPPA authorizes the Attorney General to file suit against any person the Attorney General has reason to believe “is using or intends to use any method, act, or practice [that is an unlawful trade practice] in violation of ... D.C. Code § 38-3904.” D.C. Code § 28-3909(a).

26. It is an unlawful trade practice under the CPPA for any person to do any of the following:

- (a) represent that goods or services have a source, sponsorship, approval, certification, or connection that they do not have [...];
- (d) represent that goods or services are of particular standard, quality, grade, style, or model, if in fact they are of another;
- (e) misrepresent as to a material fact which has a tendency to mislead; [or]
- (f) fail to state a material fact if such failure tends to mislead [....]

D.C. Code § 28-3904.

27. Here, Defendants committed unlawful trade practices under the CPPA when they:

- i. expressly and implicitly represented to tenants that the units Defendants offered to lease and did lease are or would be maintained in a safe and habitable condition, and in compliance with the District's laws and regulations (including the District's Housing Code) when, in fact, the units were not safe and habitable and were not maintained in a manner consistent with the District's laws and regulations;
- ii. expressly and implicitly represented to tenants that the Property was safe and habitable and would be maintained in compliance the District's laws and regulations (including the District's Housing Code) when, in fact, the Property was not safe and habitable and Defendants have not maintained the Property in a manner consistent with the District's laws and regulations;
- iii. expressly and implicitly represented to tenants that Defendants have abated or will abate all Housing Code violations and any other material defects that pose a serious threat to the health, safety, or security of the tenants when, in fact, Defendants would not do so; and
- iv. collected rent from tenants while failing to inform them that Defendants would continuously and systematically fail to maintain the Property in a safe and habitable condition and in a manner consistent with the District's laws and regulations.

28. Defendants' misrepresentations and material omissions of fact both had the capacity and tendency to mislead consumers in violation of § 28-3904(a), (d), (e) and (f) of the CPPA.

29. Defendants' failure to abate the numerous Housing Code violations found within their buildings constitute violations of 16 DCMR § 3305. Such violations are also unlawful trade practices that violate § 28-3904(dd) of the CPPA.

30. Tenants have suffered substantial injury because of Defendants' violations of the CPPA. In particular, tenants have paid full rent to Defendants while being forced to live in apartments with unsafe or insanitary conditions and substantial Housing Code violations. Defendants continued to collect full rent payments from tenants despite Defendants' misrepresentations and material omissions about the conditions of the Property and their willingness to maintain it. As such, Defendants have been unjustly enriched by their unlawful acts or practices.

31. Where the Attorney General establishes a violation of the CPPA, the Court may, among other relief, award "restitution for property lost or damages suffered," issue a temporary or permanent injunction against the use of the unlawful "method act or practice," and award "a civil penalty of not more than \$1,000 for each violation, the costs of the action, and reasonable attorney's fees." D.C. Code § 28-3909(a)-(b).

32. Defendant Nowell is personally liable under the CPPA because he possessed and/or exercised the authority to control the policies and trade practices of Defendants 315 Franklin Street, Oakmont, and Sanford; was responsible for creating and implementing the alleged deceptive policies and trade practices of Defendants 315 Franklin Street, Oakmont, and Sanford that are described in this Complaint; participated in the alleged deceptive trade practices that are described in this Complaint; directed or supervised those employees of Defendants 315 Franklin Street, Oakmont, and Sanford who participated in the alleged deceptive trade practices that are described in this Complaint; and knew or should have known of the deceptive trade practices that are described in this Complaint and had the power to stop them, but rather than stopping them, promoted their use.

RELIEF REQUESTED

Wherefore, Plaintiff, the District of Columbia, respectfully requests that the Court:

- (a) Award restitution, pursuant to D.C. Code § 28-3909(a), against Defendants, jointly and severally, sufficient to disgorge the rent amounts that were unlawfully charged to tenants while the Property was uninhabitable, unsafe, in violation of the District's Housing Code, or otherwise deceptively offered and leased;
- (b) Award damages pursuant to D.C. Code § 28-3909(a) against Defendants to compensate the Defendants' tenants who were harmed while residing in the Property because it was not safe or habitable due to the Defendants' neglect;
- (c) Award civil penalties against Defendants, jointly and severally, in an amount up to \$1,000 per violation of the CPPA pursuant to D.C. Code § 28-3909(b);
- (d) Award the District all allowable costs;
- (e) Award reasonable attorney's fees pursuant to D.C. Code § 28-3909(b); and
- (f) Provide any other relief deemed appropriate by the Court.

JURY DEMAND

The District of Columbia hereby demands a trial by jury by the maximum number of jurors permitted by law.

Dated: February 2, 2018

Respectfully Submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ROBYN BENDER
Deputy Attorney General
Public Advocacy Division


PHILIP ZIPERMAN
Director, Office of Consumer Protection




JIMMY R. ROCK
Assistant Deputy Attorney General
Public Advocacy Division



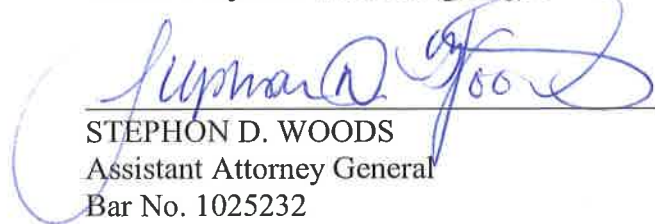
JANE LEWIS*
Chief, Housing and Community Justice Section



ARGATONIA D. WEATHERINGTON
Assistant Attorney General
Bar No. 1021691
441 4th Street, N.W., Suite 1060-N
Washington, D.C. 20001
(202) 727-6338 (phone)
(202) 730-1809 (e-fax)
Email: Argatonia.Weatherington@dc.gov



BENJAMIN WISEMAN
Assistant Attorney General
Bar No. 1005442
441 4th Street, N.W., Suite 600-S
Washington, D.C. 20001
(202) 741-5226 (phone)
(202) 741-8949 (e-fax)
Email: Benjamin.Wiseman@dc.gov



STEPHON D. WOODS
Assistant Attorney General
Bar No. 1025232
441 4th Street, N.W., Suite 630-S
Washington, D.C. 20001

* Practicing in the District of Columbia pursuant to Ct. App. R. 49(c)(4) and under the supervision of a member of the D.C. Bar.

(202) 724-5319 (phone)
(202) 715-7728 (e-fax)
Email: Stephon.Woods@dc.gov

Attorneys for the District of Columbia